

# BetterUp, Inc.

## Slavery and Human Trafficking Statement for the 2024 Financial Year

We are committed to improving our practices to combat slavery and human trafficking. We have published this statement in accordance with section 54 of the Modern Slavery Act 2015 (the "Act") on behalf of BetterUp, Inc. ("BetterUp", "we", "us" or "our") and its subsidiaries. It sets out the steps we have taken during the year to prevent modern slavery and human trafficking in our supply chains and in our business generally.

We are committed to acting ethically and with integrity in all our business relationships, and this includes taking steps to work towards the prevention and/or removal of slavery and human trafficking from our business and our supplier relationship. We are a business mainly within two geographic regions, EMEAR and North America, with locally based companies. In the United Kingdom, our main subsidiary is BetterUp UK Limited. We are aware that modern slavery exists even in the UK and accept that we cannot be complacent when it comes to the prevention of modern slavery.

BetterUp is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its procurement, consistent with its disclosure obligations under the UK's Modern Slavery Act 2015.

## Our Structure, Business and Supply Chain

BetterUp combines world-class coaching with AI technology and behavioural science to deliver personalized behaviour change and improve the well-being, adaptability, and effectiveness at scale. With the world's largest network of over 3,000 coaches, we offer coaching in 46 languages across over 90 countries, along with interactive professional development content, analytics, and real-time insights to track human progress. We drive transformational and lasting behaviour change, resulting in improved business outcomes across organizations and inspiring people everywhere to pursue their lives with greater clarity, purpose, and passion.

Our supply chains include the following:

- People: recruitment and training services.
- Marketing: media advertising and market research services.
- Professional Services: consultancy and advisory services.
- Technology: external data centres, data providers, IT infrastructure, hardware providers, cyber security services, and software suppliers.

## Our Policies in relation to Slavery and Human Trafficking

We respect human rights and the integrity of individuals. We comply with all relevant laws in the way we run our businesses.

We respect and protect individual human rights and comply with the employment laws in every location in which we do business. All employees are to be provided with safe, secure, and humane working conditions and fair wages. BetterUp has zero tolerance for forced labor, involuntary servitude, child labor, commercial exploitation, or human trafficking. We expect our subcontractors, suppliers, and other business partners to uphold these same standards and will not knowingly do business with those who do not. BetterUp's suppliers are to respect the right of employees to associate freely, form and join workers organizations of their own choosing, seek

representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations.

We are committed to conducting our businesses ethically and lawfully which includes ensuring, as far as possible, that any third parties who act for us share this commitment. BetterUp will identify and mitigate risks associated with the third parties who perform services for us or on our behalf. This includes guidance on undertaking appropriate due diligence on existing or prospective third parties based on identifiable risks.

### **Assessing and Managing Risk – Due Diligence and Contracting Practises.**

We conduct due diligence on our suppliers by requesting information from them (which includes information about the steps they take to ensure there is no modern slavery or human trafficking in their business or supply chains). We keep our due diligence processes under constant review.

We consider key suppliers' responses to our due diligence requests as part of our decision-making processes when it comes to using new suppliers. We take appropriate action and, if necessary, delay or cancel appointing a new supplier unless the supplier's systems and controls are satisfactory.

We have company-wide template clauses which are included in appropriate contracts to allow contracting parties to formally acknowledge, commit to and abide by applicable anti-slavery and human trafficking legislation.

We have continued to provide advice and guidance to the relevant commercial teams with direct responsibility for entering supplier contracts.

### **Our commitment**

We are committed to continuously improving our practices to identify and eliminate any slavery and human trafficking in our business and supply chains, and to acting ethically and with integrity in all our business relationships.

### **Approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the group's slavery and human trafficking statement for the financial year ending 31 January 2025.