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2024 Clarivate Modern Slavery Statement

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Clarivate PLC Modern Slavery Statement

This statement is published in accordance with the Modern Slavery Act (UK) 2015. It sets forth the processes Clarivate PLC and its in-scope subsidiaries, Camelot UK Bidco Limited, Camelot UK Holdco Limited, Camelot UK Top Holdco Limited, Computer Patent Annuities International Limited, CPA Global Management Services Limited, and ProQuest European Holdings Limited (“Clarivate”, “We”, or “Our”) have implemented to prevent modern slavery and human trafficking from occurring in its business and supply chains. To support this objective, Clarivate adopted a proactive approach, focusing on our suppliers, and our internal operations through screening, assessment, and monitoring internal and supplier adherence to applicable laws. We are committed to reviewing and improving our processes over time and set out the steps we currently employ and those we intend to take to embed modern slavery risk management across our organization and business activities.

About Clarivate

As a leading global provider of transformative intelligence, our vision at Clarivate is to fuel the world’s greatest breakthroughs by harnessing the power of human ingenuity.

Clarivate is a global publicly traded company headquartered in the U.K. and listed on the New York Stock Exchange. We operate through more than 200 subsidiaries, employ around 12,000 colleagues worldwide, and customers in 180 countries. We connect people and organizations to intelligence they can trust to transform their perspective, their work and our world. Our subscription and technology-based solutions are coupled with deep domain expertise, covering the areas of Academia & Government, Life Sciences & Healthcare and Intellectual Property. We aim to build a lasting, sustainable legacy by supporting the world’s explorers, researchers and innovators to help people and our planet for years to come.

Our clients are some of the world’s leading researchers and problem solvers. More than 45,000 universities, non-profits, funding organizations, libraries, corporations, law firms, government organizations and independent researchers trust us to provide them with the right information at the right time to discover, protect and commercialize new ideas.

Operating ethically and responsibly is a core component of our mission. We have created an interconnected, shared purpose and a strong operating philosophy that guides the actions of our leadership and colleagues around the globe. These elements are rooted in our purpose and vision, underpinned by our values to help guide our colleagues every day – so our collective focus remains sustainable growth for the greater good.

Our core values are cultural cornerstones that guide our actions from the day-to-day decisions from how we interact with each other to how we prioritize building trusted partnerships with every client and supplier worldwide.

Our Purpose, Vision and Mission

Our purpose: To elevate the ideas that will benefit everyday life.

Our vision: To fuel the world's greatest breakthroughs by harnessing the power of human ingenuity.

Our mission: To advance the success of people and organizations through transformative intelligence and trusted partnerships.

Our values

We aim for greatness: We challenge the status quo, pursue continuous innovation and improvement and strive to deliver an exceptional customer experience in all we do.

We value every voice: We work together in respectful partnership with our colleagues and customers, which is our evergreen source of sustainability and success. The best results come from an inclusive and collaborative environment.

We own our actions: Trust is built on actions. We act with integrity and are accountable to ourselves, our colleagues, our customers, shareholders and our communities.

Supplier Management

Clarivate takes a company-wide approach to managing modern slavery risks in its operations and supply chain including, but not limited to, its reporting entities.

We have a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings across our company and to implementing effective systems and controls to safeguard against any form of modern slavery taking place within our business operations or supply chain. We are firmly opposed to forced labour and all forms of labour exploitation. We continually work towards minimising the risk of human rights violations. A key priority towards addressing modern slavery risks rests with our efforts to review, assess, and monitor our supplier base, particularly medium and high risk suppliers. We also remain committed to demonstrating progress year over year toward combatting modern slavery through continued process improvements, risk assessments, monitoring, and internal auditing that is tailored and appropriate to our risk profile and business. By maintaining robust corporate governance, we create a roadmap for long-term success and shareholder value, facilitated by our purposeful strategies and corporate responsibility.

Clarivate sources goods and services from suppliers world-wide. The goods and services encompass numerous categories including, but not limited to, Information Technology (IT) (e.g., hardware, software, and telecommunications); Non-IT (e.g., advertising, office machines, office supplies, printing, travel and entertainment); Professional Services (e.g., consulting, finance, legal, auditors); and real estate and related services (e.g., facilities, furniture, fixtures, security and office supplies). Clarivate endeavours to conduct appropriate risk screening of all suppliers and require those suppliers to fully comply with applicable laws pertaining to slavery, forced labour and human trafficking laws, and expects suppliers to enact practices to ensure compliance with such laws.

Our Approach to Modern Slavery – Promoting an Ethical Supply Chain

We treat everyone equally, with dignity and respect, regardless of background, culture or circumstances. We comply with all applicable laws, rules and regulations relating to equal employment opportunities, and are committed to providing equal opportunities to all colleagues and supporting people and communities wherever possible. We have taken a stand against modern slavery and human trafficking across our business. Our goal is to provide a work environment that is safe, inclusive and inspiring, while striving for equal opportunities for all colleagues globally.

By aligning our goals with the 10 principles of the UN Global Compact and the UK Modern Slavery Act, we conduct business in a manner that respects the rights and dignity of all people. We support the principles contained in the United Nations Universal Declaration of Human Rights.

We require our suppliers by contract and in accordance with our Supply Chain Code of Conduct to treat their employees fairly and in accordance with applicable laws and regulations regarding labor, employment and the following principles:

- Freely chosen employment
- Respect for freedom of association and the right to collective bargaining
- Safe, healthy and hygienic working conditions
- No child labor
- Fair and equitable wages and benefits
- No excessive working hours
- No discrimination is practiced
- No harsh or inhumane treatment
- Promotion of supplier diversity

Ethical Leadership

Our standard for ethics and integrity at Clarivate starts with our Board of Directors and executive leadership team. To build and maintain relationships with shareholders, our Board and its committees work closely with our functional leaders and working groups to help move our journey forward with transparency and accountability. Customer and supplier relationships, together with a sustainability focus, have an expanding influence on our business strategy, risk management, and overall performance, so we are committed to being ‘all in’ across all regions, every role, and every way we do business at Clarivate.

Our Board strongly believes in the value of an independent and diverse Board of Directors to provide effective oversight of management. The Board’s aim is for its membership to be composed of highly qualified directors who demonstrate diverse perspectives and backgrounds, with the integrity and suitability to oversee the management of our company and its global footprint. The Nominating and Governance Committee has a robust director selection process, resulting in a diverse and global Board.

Enterprise Risk Management

By taking a strategic approach to risk management, we are better equipped to anticipate the direction and impact of change across our business and around the world. This approach also helps us connect our long-term vision and sustainability principles so we can avoid barriers to success and actively pursue opportunities to achieve our goals.

Risk management is the responsibility of every colleague in the company; however, different stakeholders have different objectives and levels of accountability with respect to monitoring and implementation.

- The Board of Directors, acting directly and through its committees, is responsible overseeing the Company’s risk management. Each of the Board’s four committees – Audit, Human Resources and Compensation, Nominating and Governance and Finance – assists the Board in its oversight of the Company’s risk management, as set forth in the relevant committee charters.
- The Management Risk Committee is an integral part of the company’s enterprise risk management governance framework and serves as an internal forum for

identifying, communicating, assessing, responding to, and monitoring risks and issues that could impact Clarivate.

- Business segment and functional leaders are responsible for maintaining a sustainable risk management program that aligns with the company's enterprise risk management governance framework.
- Business segment risk reviews serve as internal forums for identifying, communicating, assessing, responding to, and monitoring risks and issues that could impact Clarivate at an operational level.
- The Chief Risk and Sustainability Officer (CRSO) is responsible for establishing the enterprise risk management process within the organization and for managing relationships between risk categories and interdependencies. The CRSO facilitates risk oversight and accountability across all levels of the company by providing best practices, common risk management techniques, and promoting a consistent risk appetite.

Policy Commitment

At Clarivate, our [Code of Conduct](#) serves as the foundation for establishing global leadership as an ethical company. We have embedded it into our corporate culture as our guide for behaving with trust, respect, and ethics, and we bring it to life through our actions. Throughout our global organization, it is the cornerstone of our compliance program and provides guidance on how we represent our brand in everything we say and do. It reflects our mission, vision, and purpose, especially in fostering trust, respect, integrity and sustainability.

Our Code of Conduct covers a broad spectrum of guidelines, including modern slavery, anti-corruption and bribery, proper use of AI and corporate assets, confidentiality, health and safety, gift giving, conflicts of interest, and anti-fraud. Our commitment is to have all colleagues complete our online Code of Conduct training and acknowledge it annually. All new colleagues must complete and acknowledge this training shortly after joining, with progress monitored by our Compliance team. We supplement this with targeted training, best practices, and continual leadership guidance.

At Clarivate, we mitigate modern slavery and ethical risks by working closely with responsible suppliers who have agreed to our [Supply Chain Code of Conduct](#), which contains guidelines and requirements to comply with all laws relating to modern slavery, anti-corruption, employee rights, privacy and confidentiality. It helps ensure comparable standards of behaviour among our suppliers worldwide and drives continuous improvements throughout our supply chain.

Supplier Due Diligence

Clarivate has processes in place to identify and mitigate risks of modern slavery and corruption within its suppliers. This risk is managed, in part, by contractually requiring suppliers to comply with all applicable laws, maintain appropriate policies to avoid

complicity in human-rights abuses, and to follow our Supply Chain Code of Conduct. To further mitigate supplier risk, Clarivate employs third parties and processes to bolster its due diligence.

With the help of EcoVadis, a supply chain sustainability ratings platform, we evaluate our suppliers for their sustainability policies, ratings, implementation measures, and more. Our goal is to gain better insight into all aspects of supplier responsibility and diversity. We use these data to support more informed decisions about partnerships that build a resilient and sustainable supply chain.

We use metrics to help us better understand and advance supplier onboarding, such as:

- Tracking the number and percentage of suppliers representing our manageable spend that complete a comprehensive sustainability assessment and using EcoVadis to analyse 78 management indicators across 21 different sustainability criteria.
- Evaluating suppliers across a broader range of ESG criteria.
- Performing an annual review of Clarivate suppliers to drive positive impacts and a more responsible supply chain.

Clarivate also maintains a third-party risk assessment program for conducting in depth due diligence and related risk analyses on our supply base. These processes are designed, implemented, maintained, and monitored by a dedicated Compliance team to ensure our suppliers adhere to the same stringent standards Clarivate advocates. The risk assessment process:

- Evaluates supplier location, service/product category, and government contacts to provide guidance on potential corruption risk, as assessed by the Corruption Perceptions Index (CPI).
- Automatically screens suppliers prior to onboarding against global sanctions and enforcement databases, including the US Office of Foreign Assets Control, UK sanctions regimes, UN sanctions, and Debarment lists, and continues to screen them quarterly.
- Automatically screens suppliers globally for negative media, with quarterly automated updates.
- Requires certain suppliers to complete supplemental information security and privacy due diligence questionnaires depending on the type of service provided and access to personal and confidential information.
- Subjects medium and high risk suppliers to additional anti-corruption due diligence.

Grievance Process

Clarivate maintains a global Ethics Hotline that allows colleagues and other stakeholders, including suppliers, to report and track concerns regarding potentially unlawful, improper, or questionable conduct, including human rights and modern slavery violations. The process enables efficient investigation and, if substantiated, remediation, of reported modern slavery and other ethics related incidents. All reports to the Ethics Hotline are

confidential, and anonymity is provided to those who request it. Individuals are encouraged to report without fear of retaliation, and retaliation is strictly prohibited under our Code of Conduct. To the extent Clarivate identifies a modern slavery issue with a supplier, it may take steps to remediate the issue, including reviewing the supplier's policies and practices, or terminating its relationship with the supplier. To date, no modern slavery complaints have been received via the Ethics Hotline or Clarivate's open door compliance policy.

Ongoing Plans

Going forward Clarivate will continue efforts to promote an ethical supply chain and reduce the risk of slavery and human rights abuses in its operations by:

- Identifying opportunities to strengthen public modern slavery policy commitments.
- Reviewing and enhancing supplier due-diligence processes to better define risk tiers and vendor categories.
- Updating the Supply Chain Code of Conduct and establishing guidelines for proactive supplier monitoring, including supplemental due diligence and onsite reviews of third party agents.
- Supplementing modern slavery training to employees that work with high risk suppliers or in markets considered higher risk for modern slavery.

Criteria reference table

The table below provides reference pages for the relevant disclosures in each criterion for the United Kingdom's Modern Slavery Act 2015.

United Kingdom's Modern Slavery Act 2015 requirements	2024 Modern Slavery Statement page reference
54(5)(a) the organisation's structure, its business and its supply chains	4, 5
54(5)(d) the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	5, 6, 10
54(5)(b) its policies in relation to slavery and human trafficking; (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains; and (f) the training about slavery and human trafficking available to its staff	6 - 10
54(5)(e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	8, 9, 10

Modern Slavery Act - in-scope entities

Clarivate has chosen to make a joint Modern Slavery Act Statement (“Statement”) at the group level even though this approach is not required by the UK Modern Slavery Act (the “Act”).

The specific Clarivate Group entities in scope and that have approved the statement for the financial year end 31 December 2024 are:

United Kingdom

- Camelot UK Bidco Limited
- Camelot UK Holdco Limited
- Camelot UK Top Holdco Limited
- Computer Patent Annuities International Limited
- CPA Global Management Services Limited
- ProQuest European Holdings Limited

Statement of the Board of Directors

Our Board of Directors is responsible for the oversight of our modern slavery statement. However, we took a cross-functional approach to preparing and drafting this Statement, including legal, human resources, risk, sustainability, compliance and procurement group functions.

The Nominating and Governance Committee of our Board of Directors provides oversight, review and/or approval of matters relating to our sustainability priorities, including those relating to our supply chain, work force and external stakeholders.

Accordingly, based upon the findings and recommendations of the Nominating and Governance Committee, the governing body of each reporting entity listed herein has considered and approved this statement prior to publication. This Statement will be reviewed and updated annually.

Matti Shem Tov
Chief Executive Officer and Director
Clarivate Plc.