

## UK Modern Slavery Statement

In furtherance of its internal company values and in compliance with the Modern Slavery Act of 2015, Clearwater Analytics, Ltd. ("Clearwater") hereby states its commitment to combatting modern slavery and human trafficking in both its core business and its supply chains.

Clearwater is the U.K. subsidiary of USA-based Clearwater Analytics, LLC, which is the operating entity for the N.Y.S.E. publicly traded parent company, Clearwater Analytics Holdings, Inc. under the stock ticker CWAN.

Clearwater Analytics Holdings, Inc. is a global leader in providing a Software-as-a-Service ("SaaS") Solution for investment portfolio reporting and analytics on over \$6.4 trillion USD in assets daily. Clearwater's web-based platform provides clients with an easy navigation system to streamline the complexities of aggregating, reconciling, validating, and reporting on financial portfolios. Its fully integrated investment accounting, compliance, performance, and risk reporting solution is specifically designed to address the unique regulatory and reporting requirements of operating funds.

Clearwater's Code of Ethics states:

Clearwater strives to comply with all applicable laws and respect internationally recognized human rights where we operate, and we expect the same of those we do business with. Clearwater does not engage in child labor, forced, bonded, or indentured labor, involuntary prison labor, slavery, trafficking of persons, or physical punishment.

Clearwater's Code of Ethics may be found on the Clearwater group's public website here: <https://investors.clearwateranalytics.com/governance/governance-documents/default.aspx>.

Clearwater condemns, in the strongest of terms, any use of child labor, forced, bonded, or indentured labor, involuntary prison labor, slavery, trafficking of persons, or physical punishment in its business or supply chain. Clearwater does not engage in this conduct within its business and does not tolerate any such conduct from its suppliers or vendors.

Due to the nature of Clearwater's business as a SaaS provider, utilizing a sophisticated and mobile workforce and vendors primarily located in the UK,<sup>1</sup> Clearwater believes that the risk of modern slavery and human trafficking in its employee base and its supply chain is low.

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<sup>1</sup> This does not include vendors that provide financial data to the global Clearwater group.

Nonetheless, Clearwater has policies and practices in place to mitigate the possibility of modern slavery, human trafficking, and other compliance issues. Clearwater conducts background checks on all new hires, as permitted by law. Clearwater also verifies that employees are legally permitted to work in the country of the respective Clearwater office. This includes a verification of residence and work permits, as applicable.

Clearwater provides annual trainings and requires all new hires to read and agree to abide by Clearwater's Code of Ethics. Clearwater's Code of Ethics and other company policies are available at all times on Clearwater's intranet.

Any Clearwater employee who believes that Clearwater or its employees, officers, or directors are violating laws or any of Clearwater's policies is invited to raise concerns with their supervisor, Human Resources, Legal, senior management, or via an anonymous whistleblower and complaint hotline through which such issues may be reported and investigated.

Importantly, Clearwater has not received any allegations or reports of modern slavery or human trafficking within its business or supply chain.

The seventh pillar of Clearwater's Code of Ethics states, "We are committed to having values beyond reproach. This seventh value is the foundation upon which we build success." Clearwater reaffirms its opposition to both modern slavery and human trafficking and its commitment to conducting its business with values beyond reproach.



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Sandeep Sahai

Chief Executive Officer and Board Member