

## Modern Slavery Act Transparency Notice : January 1, 2022

At EFI, we are committed to recognising and combatting the risk of modern slavery in our supply chain. We work with our suppliers to build a business with respect for human rights at its core. This statement sets out the steps taken by EFI's companies to prevent modern slavery in its own business and supply chain for the financial year ending 31 December 2021.

This statement has been published in accordance with the Modern Slavery Act 2015. The statement is issued by Electronics for Imaging, Inc. for each of EFI Inc.'s subsidiaries operating in the United Kingdom regardless of whether they are specifically required by the Act to publish an annual modern slavery statement (those companies are identified in the annex attached to this statement).

### Overview of our structure, business and supply chains

EFI is an international company headquartered in California that specialises in digital printing technology. EFI is leading the transformation from analog to digital imaging with scalable, digital, award-winning products and software. EFI develops breakthrough technologies for the manufacturing of signage, packaging, textiles, ceramic tiles, and personalised documents. We work with a wide range of printers, inks, digital front ends, and a comprehensive business and production workflow suite that transforms and streamlines the entire production process.

EFI has approximately 3,000 worldwide team members. We have 29 offices globally and have been in business for over 30 years. EFI's supply chain is both extensive and diverse. We have approximately over 8000 suppliers globally.

### Our policies related to slavery and human trafficking

EFI has an extensive set of corporate policies that guide our internal teams and external suppliers in the ethical standards that EFI expects in all aspects of our operations and our supply chain. EFI's policies are regularly reviewed and revised to ensure they remain current and appropriate.

Our policies which underscore our commitment to ethical business practices, including taking a 'zero tolerance' stance to modern slavery include:

- Code of Business Conduct and Ethics;
- Anti-Bribery Policy;
- Business Risk Services Charter; and
- Conflict Minerals Corporate Policy.

Our Code of Business Conduct and Ethics is required to be acknowledged and committed to by every service provider who places a Purchase Order with EFI. It contains guidelines on ethical and safe working. It encourages all service providers to exercise good judgement and refer any potential issues to EFI's HR or the legal department, so they can be investigated and resolved effectively and efficiently.

The Business Risk Services Charter outlines the powers of our independent and objective Business Risk Services team. The team is responsible for reviewing and assessing compliance with applicable laws, regulations, and internal policies and procedures.

As a company, we recognise that an area for potential maltreatment of workers is in the supply of so-called 'conflict materials'. Conflict materials include materials such as cassiterite, columbite-tantalite (coltan), gold, wolframite, and their derivatives, tin, tantalum, and tungsten (3TG), which are sourced from the Democratic Republic of the Congo, the

Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, or Angola. We do not purchase raw materials, subassemblies, or supplies that are known to contain 3TG and directly or indirectly finance or benefit armed groups in the aforementioned countries.

We expect that our direct and indirect suppliers will undertake reasonable due diligence in connection with the materials supplied to us and will provide reasonable assurance that products sold to us are in compliance with our Conflict Minerals Corporate Policy. Proof of such due diligence we require from our suppliers may include providing documentation showing that raw materials used to produce 3TG in the components and products supplied to us originate from outside of the Covered Countries or are from recycled or scrap sources. In instances in which the 3TG used to produce components or products that are supplied to us originate from the covered countries, the mines or smelters used to produce such 3TG are required to be certified as “conflict free” by an independent third party.

Our policies are under review with the intention of bringing them and our statements of the ethical requirements of EFI more directly into line with the requirements of the current Modern Slavery Act and possible future amendments to the Act.

#### Due diligence

Our present due diligence on modern slavery issues are embedded in the ethical risk assessment we undertake when contracting with new suppliers to the business. Our future plans, as referred to below, include the assessment of our supply chain to assign a risk rating for each supplier. Depending on the supplier risk rating we will conduct our own public information searches, deploy supplier modern slavery specific questionnaires and audits. In this way we intend to adopt a risk based, effective and proportionate due diligence and risk assessment approach. Irrespective of risk rating each supplier will be required annually to self-certify their own compliance with applicable modern slavery and human trafficking legislation and regulation.

#### Risk assessment

We will conduct an annual risk and gap assessment to ensure EFI understands the full nature of its own business and the global landscape of its supply chain. The risk and gap analysis will help us identify where risks are most likely to appear in our supply chain and business so we can address and prioritise them.

#### Performance monitoring

We aim to monitor and increase the ethical standards in our supply chain.

#### Training about slavery and human trafficking

All EFI employees are required to read and understand the EFI policies and uphold them in day to day activities. All employees are also expected to ensure that all agents and contractors are aware of, understand and adhere to our standards.

We are in the course of developing a specific Modern Slavery and Human Trafficking training programme that we will incorporate into our corporate training and deliver to key employees.

#### Whistleblowing

Our whistleblowing line encourages our employees and suppliers to report any concerns, including those about modern slavery and any other human rights violations. The confidential whistleblowing hotline is available to all employees and suppliers to alert the

Senior Director of Business Risk Services to any issues, on an anonymous basis if they prefer. All reports to the hotline are reviewed and, where necessary, investigated.

If any employee or stakeholder has any questions, concerns or suggestions related to modern slavery, they are encouraged to ask either their EFI contacts, the Legal team [strategicrelations@efi.com](mailto:strategicrelations@efi.com) or HR teams [HRTeam@efi.com](mailto:HRTeam@efi.com).

#### Other current protections against modern slavery

EFI's standard commercial supplier contracts have been adjusted to incorporate express compliance clauses.

When onboarding a new supplier, we obtain information from them on the processes and policies they currently use to tackle modern day slavery.

#### Further actions

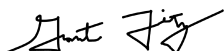
We are committed to developing and improving the measures we have in place to combat slavery and human trafficking in our business and in our supply chain. Accordingly, we will monitor global developments in pertinent legislation and regulation and will adapt and adjust our policies and stance accordingly.

In addition to the risk assessment outlined above, as part of our commitment to continual improvement we have identified the following as areas for attention in the financial year ahead:

- We will introduce a specialist Modern Slavery and Human Trafficking training programme for staff who work directly with our supply chain partners.
- We will request that existing suppliers complete a questionnaire on modern slavery to ensure all local slavery and human trafficking laws are being complied with.

#### Board approval

This Transparency Statement was approved in December 2021 by the Board of Directors of Electronics for Imaging United Kingdom Limited. It is signed by the Chief Financial Officer who is also a member of the Board of Directors.



Grant Fitz

Chief Financial Officer

Date: December 19, 2021

Annex

<b>Name of organisation</b>	<b>Address</b>
Electronics for Imaging United Kingdom Limited	Manor Farm High Street Dronfield Derbyshire S18 1PY
Golflane Limited	Manor Farm High Street Dronfield Derbyshire S18 1PY
Radius Solutions Limited	Manor Farm High Street Dronfield Derbyshire S18 1PY
Prism Group Holdings Limited	Midland House 2 <sup>nd</sup> Floor North Station Road Colchester Essex CO1 1RB
Rialco Limited	Bowling Old Lane Bradford West Yorkshire BD 5 7DT
Escada Innovation Ltd.	C4Di Queen Street Hull East Yorkshire HU1 1UU
Escada Systems Limited	C4Di Queen Street Hull East Yorkshire HU1 1UU
Escada Systems (Europe) Ltd.	The Old Granary The Courtyard Units 1, 4, & 5 Swinton Grange Malton North Yorkshire
Shuttleworth Business Systems Limited	Unit 1 Orion Park Orion Way Kettering Northamptonshire NN15 6PP