



# **UK MODERN SLAVERY ACT STATEMENT**



## **Modern Slavery Act Statement**

**For the financial year ending on September 30, 2021**

Nuance Communications Ireland Limited and Nuance Communications UK Limited, are subsidiaries of Nuance Communications, Inc., a global technology company and provider of voice recognition solutions and natural language understanding technologies headquartered in Burlington, Massachusetts, United States.

We are committed to acting with integrity, which is one of our key corporate values and part of our [Code of Business Conduct and Ethics](#).

Nuance is against all forms of modern slavery, and it has no place in our global operations. We are committed to being a responsible organisation and to respecting human rights. Nuance only wants to work with individuals who choose to work freely and who have rights to equal opportunity, freedom of association and collective bargaining.

Nuance takes enormous pride in our longstanding reputation for acting with integrity and making a real difference to people's lives through technology. This reputation is vital to our success as a company. The strength of our reputation is based not only on our own conduct but also on the actions of those with whom we do business. For that reason, we aspire to only work with companies that share our values, abide by all applicable laws, and reflect the same high ethical standards.

As part of our Corporate Social Responsibility (CSR), we are committed to improving our practices to help combat slavery and human trafficking.

### **ORGANISATION STRUCTURE**

We are subsidiaries of a global provider of voice recognition solutions and natural language understanding technologies. We are a part of the Nuance Communications Group, and our ultimate parent company is Nuance Communications, Inc. with its head office in Burlington Massachusetts, United States. Our Group has approximately 7,000 employees worldwide and operate in 35 countries.

### **OUR BUSINESS**

We are a pioneer and leader in conversational artificial intelligence ("AI") innovations that bring intelligence to everyday work and life. We deliver solutions that understand, analyse, and respond to people - amplifying human intelligence to increase productivity and security.



With decades of domain and AI expertise, we work with thousands of organizations globally across healthcare, financial services, telecommunications, government, and retail - to create stronger relationships and better experiences for their customers and workforce. We offer our customers high accuracy in automated speech recognition, natural language understanding capabilities, dialog and information management, biometric speaker authentication, text-to-speech, and domain knowledge, along with professional services and implementation support. In addition, our solutions increasingly utilize our innovations in AI, including cognitive sciences and machine learning to create smarter, more natural experiences with technology. Using advanced analytics and algorithms, our technologies create personalized experiences and transform the way people interact with information and the technology around them. We market and sell our solutions and technologies around the world directly through a dedicated sales force, and also through a global network of resellers, including system integrators, independent software vendors, value-added resellers, distributors, hardware vendors, telecommunications carriers, and e-commerce websites.

Our business is organised into two business units: Enterprise and Healthcare.

### **Healthcare**

We create clinical understanding solutions that drive smart, efficient decisions across healthcare. More than 500,000 physicians and 10,000 healthcare facilities worldwide leverage Nuance's voice-enabled clinical documentation and analytics solutions to support the physician in any clinical workflow and on any device.

### **Enterprise**

We enable companies to engage with consumers in a way that is personalized and conversational by leveraging decades of experience in speech, natural language understanding and artificial intelligence. Nuance delivers this more human, connected conversation through multichannel experiences that integrate proactive engagement, voice biometrics, conversational IVR, and mobile and Web virtual assistants.

### **NUANCE COMPLIANCE ORGANISATION**

At Nuance we have a compliance team, which consists of team members from the following departments:

- Legal
- Audit and compliance
- Human resources (People Team)



- Procurement

#### **OUR CODE OF BUSINESS CONDUCT AND ETHICS**

[Our Code of Business Conduct and Ethics](#) applies to all of our global employees, contractors, officers and directors. It covers an extensive list of topics including, without limitation, the following

- Acting with integrity
- Respecting each other – workplace behaviour
- Compliance with laws
- Raising questions and reporting concerns

#### **TRAINING**

All of Nuance’s global employees receive regular training on a range of compliance topics, including those mentioned above and anti-bribery and corruption, export control compliance, data privacy, anti-trust, and other topics. Re-certification via training programmes is mandated every year for all Nuance employees everywhere in the world.

#### **OUR SUPPLY CHAINS**

Our supply chains include the sourcing of software and IT hardware and services, marketing related services, professional services (e.g. legal, accounting, IT) and services required for our workforce (e.g. payroll service providers, travel service providers) and for the maintenance of our offices (e.g. cleaning services, office supplies, utilities services).

#### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Nuance Communications Ireland Limited and Nuance Communications UK Limited and their employees follow the corporate policies of the Nuance Communications Group, including the [Code of Business Conduct and Ethics](#) mentioned above. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships

[The Nuance Third-Party Code of Conduct](#) (the “Code”) applies to all third-parties with whom we do business including our suppliers, and details our strong commitment to requiring that our suppliers adhere to all applicable laws, including those concerning the absence of modern slavery and human trafficking (i.e. freely chosen and lawful employment), the absence of use of child labour, compliance with working hours legislation, rights to equal opportunity, freedom of association and collective bargaining and humane treatment of the workforce, working hours and rest breaks, wages and benefits, diversity and equal opportunity, etc. . The Code is made up of seven sections, as follows:



1. Acting with integrity;
2. Labor;
3. Health and Safety;
4. Environment;
5. Ethics;
6. Compliance Program;
7. Compliance with the Code.

The Code encourages our suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics. In alignment with the UN Guiding Principles on Business and Human Rights, the provisions in the Code are derived from key international human rights standards including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights.

The Code sets high standards of integrity from all of our suppliers. It outlines the commitment Nuance needs from each supplier to act compliantly and ethically in business activities. It is the responsibility of each Nuance supplier to ensure that their employees, agents, and subcontractors working on Nuance related business and business opportunities understand and comply with the Code. Failure to adhere to the Code or any applicable law is grounds for Nuance to terminate our business relationship with a supplier.

Every Nuance supplier is required to notify Nuance as soon as reasonably possible upon becoming aware of any violations of applicable law or the Code, or of any other allegations of wrongdoing related to their business with Nuance.

#### **SUPPLIER ADHERENCE TO OUR VALUES**

WE HAVE ZERO TOLERANCE TO SLAVERY AND HUMAN TRAFFICKING. TO ENSURE ALL THOSE IN OUR SUPPLY CHAIN AND CONTRACTORS COMPLY WITH OUR VALUES, WE ARE DEVELOPING A COMPREHENSIVE VENDOR MANAGEMENT PROGRAM THAT TAKES INTO ACCOUNT OUR SUPPLIERS' PAST PERFORMANCE AS WELL AS THEIR SOCIAL COMMITMENTS. THIS PROGRAM INCLUDES OUR THIRD-PARTY CODE OF CONDUCT THAT IS DESIGNED TO ENSURE THAT OUR SUPPLY CHAIN COMPLIES WITH THE MODERN SLAVERY ACT AND MAKES EFFORTS TO ESTABLISH LEGALLY COMPLIANT WORKING STANDARDS ACROSS EACH SUPPLIERS BUSINESSES. WE ARE SEEKING TO ENSURE THAT ALL OF OUR NEW AND EXISTING SUPPLIERS WILL COMPLY WITH OUR THIRD-PARTY CODE OF CONDUCT, WHICH INCLUDES THE PROTECTION OF HUMAN RIGHTS.



## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk, Nuance endeavours to conduct due diligence regarding suppliers that Nuance does business with. This includes reviewing our supply chain in order to identify risk and updating of our Third-Party Code of Conduct to establish standards that our suppliers must adhere to. We are continually reviewing and enhancing our procurement procedures, including the establishment of a robust vendor management program, the promotion of the awareness of our obligations under the Modern Slavery Act.

We intend to take the following steps to continue to mitigate risk:

- Enhance supplier communication and escalation procedures to improve due diligence data accuracy and completion at various points in the supply chain process;
- Enhance the processes in our due diligence program to increase our confidence in the credibility and reliability of the information received from our suppliers; and
- Continue a robust vendor management program across our business.

## **ASKING QUESTIONS AND REPORTING VIOLATIONS**

Any individual or entity doing business with Nuance has a statutory obligation to report knowledge or suspicion of slavery or human trafficking.

You or any third party who learns of or suspects a violation of this Modern Slavery Statement, or has any questions to us about it, should promptly report the matter to Nuance's Legal Department [generalcounsel@nuance.com](mailto:generalcounsel@nuance.com). You may also report suspected violations through Nuance's anonymous whistleblower hotline "Ethicspoint" (which is operated by a third party called NAVEX) via [www.ethicspoint.com](http://www.ethicspoint.com) or via telephone at +1 866-384-4277. In accordance with Nuance's [Code of Business Conduct and Ethics](#), reports of violations will be kept confidential to the extent possible, and Nuance will not retaliate against reporting individuals for good faith reports.

Whistle blowers are also encouraged to contact the UK Modern Slavery Helpline, which can be contacted at (0044) (0) 8000 121 700 or via their website at <https://www.modernslaveryhelpline.org/>.

## **FURTHER STEPS**

We will continue to monitor our supply chain and we are committed to ensuring that modern slavery and human trafficking practices do not exist within our supply chain.



It is of the utmost importance to Nuance to continually attempt to mitigate any risk of involvement with any individual or entity involved or associated modern slavery or human trafficking. As such, Nuance’s approach to modern slavery and human trafficking is ever evolving and we will endeavour to keep our policies up to date with developments in legislation and convention. We also aim to take the following steps in our commitment to mitigate risks in our supply chain:

1. continually review our approach to the onboarding of suppliers;
2. enhance the process for the periodic monitoring of potential risk areas in our supply chain; and
3. increase the frequency/intensity of the auditing of selected suppliers, including the completion of a risk-based questionnaire by selected suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending September 30, 2021

Signed for and on behalf of Nuance Communications Ireland Limited and Nuance Communications UK Limited

A handwritten signature in blue ink that reads 'Caroline Curtis'.

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Caroline Curtis, Director, Nuance Communications UK Limited &  
Director, Nuance Communications Ireland Limited