

OpenText Equal Employment Opportunity Statement of Policy (US)

Statement of Policy

Open Text Corporation (the “Company”) seeks to ensure equal employment opportunity (“EEO”) in accordance with all applicable state and federal regulations and guidelines. Discrimination or harassment of employees or applicants on the basis of any of sex, gender identity, sexual orientation, age, race, color, religious creed, national origin, physical or mental disability, protected veteran status or any other characteristic protected by law (each, a “protected characteristic”) will not be tolerated.

The Company’s commitment to equal employment opportunity and non-discrimination are inclusive of any and all employment practices, including but not limited to recruitment, advertising, job application procedures, hiring, upgrading, training, promotion, transfer, compensation, job assignments, benefits, and/or other terms, conditions, or privileges of employment (collectively, “employment practices”), provided the individual is qualified, with or without reasonable accommodations, to perform the essential functions of the job. This policy applies to all jobs at the Company.

The Company will continue to ensure that individuals are employed, and that employees are treated during employment, without regard to a protected characteristic in all employment practices as follows:

- Employment decisions at the Company are based on legitimate job-related criteria;
- All personnel actions or programs that affect the employment practices of qualified individuals, and selection for training, are made without discrimination of any protected characteristic.
- Employees may choose to voluntarily disclose their sex, race, national origin, disability, and protected veteran status at any time by contacting Human Resources. This information may be used for diversity reporting or accommodation but not for employment decisions.
- Employees and applicants with disabilities and veterans with disabilities are encouraged to inform Human Resources if they need a reasonable accommodation to perform a job for which they are otherwise qualified. The Company makes, and will continue to make, reasonable accommodations for an otherwise qualified applicant or employee to promote the employment of qualified individuals with disabilities and veterans with disabilities, unless such accommodations would impose an undue hardship on the operations of the Company’s business or the essential functions of the job.

OpenText is fully committed to principals of equal employment opportunity and affirmative action.

Accountabilities

The Company’s Equal Opportunity Officer is responsible for implementation of the Company’s equal opportunity action activities, including to fully implement the Company’s Equal Opportunity Action Programs (“EOAP”).

All managers and supervisors are expected to take an active part in the EOAP to ensure all qualified employees and prospective employees are considered and treated in a nondiscriminatory manner with respect to all employment decisions. Furthermore, the Company will solicit the cooperation and support of all employees for this Policy.

All managers, supervisors and employees will comply with state and federal equal employment laws, rules regulations and guidelines.

Strategic Goals

The EOAP will incorporate the following strategies to ensure the Company's commitment to EEO:

- EEO Recruitment Sources and Strategy: The Company will make a good faith effort to recruit a diverse group of employees, providing equal opportunity for minorities, women, persons with disabilities and protected veterans.
- EEO Selection Strategy: The Company will utilize procedures, processes and techniques that are fair and do not have an disproportionate adverse impact on minorities, women, persons with disabilities or protected veterans. Prospective employees will not be excluded from the hiring process due to protected characteristics.
- EEO Placement/Orientation Strategy: Newly hired employees will be provided with basic employment information during the first couple of weeks on the job including information regarding corporate policies and procedures as well as compensation and benefit information. Employees will not be denied compensation, benefits or promotional opportunities based on protected characteristics.
- EEO Performance Evaluation Strategy: The Company will evaluate the performance of their employees on an annual basis. Manager feedback will be provided to help identify areas to be improved as well as reinforcement of activities that met or exceeded expectations. Performance evaluations will be completed without regard to protected characteristics.
- EEO Training Strategy: The Company will continue to promote EEO by providing tools and training to all managers and employees.
- EEO Discipline Strategy: The Company has established policies which support respect, promote equity, diversity and inclusion and a workplace free of harassment and discrimination. Employees who violate these policies will be subject to disciplinary action up to and/or including termination.
- EEO Separation Strategy: The Company has established an Employee Satisfaction Survey which shall be completed regularly by employees. This provides the Company with an understanding of employment engagement levels and key risk areas that help decrease employee turnover.
- EEO Monitoring Strategy: The Company will ensure that Human Resources leaders clearly understand this Policy and hold managers and supervisors accountable for the effectiveness of this Policy.

The EOAPs include an audit and reporting system which, among other things, uses metrics and other information to measure the effectiveness of the EOAPs.

The Company's Equal Opportunity Officer has been assigned responsibility for periodically reviewing progress in the compliance and implementation of the EOAPs. In accordance with applicable laws, the EOAPs for qualified individuals with disabilities and protected veterans are available for inspection in the Human Resources Department, Monday through Friday, from 8:30am – 4:30pm (EST) upon request.

This policy will be available to all employees and will be posted according to regulatory obligations.

Violations

Any employees who violate this Policy will be subject to disciplinary action up to and/or including termination. Any employee who believes they have been discriminated against with respect to a protected characteristic should immediately file a complaint. You can file a complaint as follows:

- Provide a written or oral report to your manager or Employee Relations as soon as possible after the incident (employeerelations@opentext.com)
- Notify the Company's Equal Opportunity Action Officer:
 - External: contact Human Resources (hr@opentext.com)
 - Internal: contact Human Resources ([OpenText Self-Service](#) Portal)
- Report the incident as outlined in the Code of Business Conduct and Ethics by contacting the Company Compliance Officer: complianceofficer@opentext.com or call the Compliance Line: 1-800-361-8540 (24-hour hotline service)

Anti-Retaliation

Employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may have engaged in, filing a complaint, assisting or participating in an investigation, compliance review or hearing, or other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Executive Order 11246, all as amended, and/or any other federal, state, or local law or regulation regarding EEO, opposing any act or practice made unlawful, or exercising any other right protected by such laws or regulations.

The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure necessary and is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the Company or any of its affiliates, or (c) consistent with the contractor's legal duty to furnish such information.

This policy has been approved by the Company's Chief Executive Officer (CEO).