



## PTC Inc. Modern-Slavery Statement

PTC Inc. ("PTC") as a global company, respect for human rights is an integral part of our corporate social responsibility commitments. We strongly oppose illegal human trafficking and forced labour (and all other forms of modern slavery) in any form. Accordingly, PTC strives to operate in accordance with the highest standards of conduct, ethics, and fair treatment and it is committed to improving our practices for identifying and minimizing the risk of modern slavery in our operations and supply chain.

This statement constitutes the Modern Slavery Act Transparency Statement for Parametric Technology (UK) Limited, a wholly owned subsidiary of PTC Inc. ("PTC") for the financial year ending **September 30, 2023**.

### Structure, Operations, and Supply Chain

PTC Inc., founded in 1985 and headquartered in Boston, United States, has offices in more than 30 countries with over 7,000 employees located across the globe. PTC is one of the world's leading provider SaaS products, including PLM, VR, CAD and IOT and provides industrial innovation with award-winning, market-proven solutions that enable companies to differentiate their products and services, improve operational excellence, and increase workforce productivity. Given our hiring practices and the contractual, policy and statutory protections provided to all employees and as a services business that does not manufacture any tangible goods, we assess the risk of modern slavery or human trafficking occurring within our operations and supply chain to be low.

PTC's supply chain is limited and consists of services procured to operate our business and enable our employees and partners to deliver our services and aim to only hire employees that are authorized to work in accordance with applicable employment laws in the country in which they are located. Additionally, we are committed to respecting human rights in our workplace and have a number of policies and processes in place to promote a safe, diverse, and inclusive workplace.

### Actions Taken to Assess and Address Modern Slavery Risks

PTC takes a global framework approach in combatting modern slavery in our operations and supply chain. The following section provides an overview of actions taken by PTC to assess and address risks in our operations and supply chains, and the policies and processes currently in place to facilitate risk assessment, prevention, and mitigation across the globe:

### Policies and Standards

- PTC Supplier Sustainability Policy. To ensure the integrity of supplier relationships across the globe, as part of PTC's standard procurement process, PTC's suppliers are required to operate in accordance with our Supplier Sustainability Policy (or an equivalent code) and to apply this Policy in all dealings with PTC. The Supplier Sustainability Policy applies to third parties supplying goods or services to or on behalf of PTC, including staffing agencies and independent contractors, and it incorporates PTC's commitments regarding health and safety, labor and human rights, ethics, and other responsible business practices. The Supplier Code is publicly available on PTC's website at the following link: <https://www.ptc.com/-/media/Files/PDFs/supplier-sustainability-policy-2021.pdf>
- Code of Business Conduct and Ethics (Code of Conduct). The PTC Code of Conduct is the cornerstone of PTC's compliance program that provides our employees and Partners with a clear understanding of the high standards for ethical conduct by which we conduct our business globally. PTC requires that all employees of PTC Inc., and its subsidiaries, and Partners to comply with this Code of Conduct, other Company Policies, and all laws, rules, and regulations applicable to PTC wherever it does business. The Code of Conduct also requires employees and, officers and directors and Partners of PTC to deal honestly, ethically and fairly with its suppliers, customers, competitors and employees, and to ask questions, seek guidance, report suspected violations, and express any concerns regarding compliance



with it. Employees are asked to certify that they understand and will follow the ethical principles and compliance rules outlined in the Code of Conduct upon hire, followed by annual re-certification each subsequent year.

- Employee Training. PTC's Annual Compliance and Ethics Training program is also a part of PTC's commitment to maintaining a culture of compliance and ethical business practices in accordance with our Code of Conduct. Each year, PTC employees around the globe are required to complete compliance and ethics training on a variety of ethics and compliance topics. In the future, we will evaluate how we can enhance this training, in order to more effectively address human rights and modern slavery issues across the organization.

### Due Diligence Actions to Identify Modern Slavery Risks

- Supplier Certification. As part of our standard procurement process, PTC suppliers must agree to comply with the Supplier Sustainability Policy, or make an equivalent commitment, at the outset of the relationship. The Supplier Sustainability Policy expressly states that the supplier "PTC expects our suppliers to uphold internationally recognized human rights, especially those banning child labor, forced labor, slavery, discrimination, harassment and human trafficking"
- Supplier and Business Partner Due Diligence. All PTC suppliers and partners are subject to various forms of due diligence, including the verification of information provided to PTC. Additional selective, risk-based due diligence exercises are also performed on both PTC business partners and suppliers. PTC Inc.'s Vendor Risk Management processes, for both existing and new suppliers, which incorporates a new supplier questionnaire and risk assessments.
- Employee Certification. As noted above, all PTC employees are required to complete annual Compliance and Ethics Training, which requires all employees to review and re-certify their commitment to the Code of Conduct.
- Reporting Mechanisms. In order to encourage and foster a culture of reporting, PTC maintains a number of policies and reporting channels enabling employees, suppliers and Partners to report potential violations of our standards, including illegal or unethical business practices. PTC policies also prohibit retaliation or other adverse action against those that raise concerns in accordance with these policies. Reporting channels include a global Compliance and Ethics Hotline that is available 24 hours a day, seven days a week and allows for reporting on a confidential or anonymous basis. We continuously monitor these reporting mechanisms. To-date, we have received no reports involving complaints of modern slavery risks or incidents via these reporting channels.

### Assessment of Effectiveness

In future years, PTC will continue to assess the effectiveness of our actions in combatting risks of Modern Slavery, including those policies, standards and due diligence actions outlined above. PTC is always seeking to improve in this area, and it continues to review its human rights efforts, as well as best practices across different regions, to understand how we can further strengthen our commitment to ensure modern slavery and human trafficking are not taking place within our organization or our supply chains globally. PTC will continue to implement our third-party due diligence processes. We will also continue to monitor our reporting mechanisms (including any whistle-blower reports received through our Compliance and Ethics Hotline) to identify whether any of the reports reflect modern slavery incidents or risks.

### Board Approval

This statement is being published in satisfaction of the statutory obligations under section 54 of the UK Modern Slavery Act (2015) on behalf of **Parametric Technology (UK) Limited**, a wholly owned subsidiary of PTC Inc.