

Modern Slavery Statement

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1.0		New Statement	30/11/2020	Final

VOLUNTARY STATEMENT

The Australian *Modern Slavery Act 2018* (Cth) and the United Kingdom's *Modern Slavery Act 2015* (UK) (together 'the Acts') require certain large businesses to report on their actions to assess and address the risk of human trafficking and exploitation in their supply chains.

At present, ELMO Software Limited and its subsidiaries (together 'ELMO') are not obliged to comply with the reporting requirements under the Acts. Nonetheless, ELMO is committed to acting ethically and with integrity in its business dealings. This voluntary statement sets out ELMO's current approach to mitigating the risk of modern slavery and human trafficking in its supply chain.

BUSINESS STRUCTURE

ELMO is a leading provider of cloud HR and payroll software. ELMO has business operations in Australia, New Zealand and the United Kingdom. ELMO Software Limited, the parent company for the Group, is listed on the Australian Securities Exchange.

ELMO'S SUPPLY CHAIN

As a provider of cloud-based HR & payroll software solutions, ELMO's supply chain mostly consists of the hiring of service providers and the procurement of software-related goods and services. The nature of the goods and services that ELMO procures does not demand the types of labour at risk for slavery and human trafficking and as such, the risk of human trafficking and exploitation in ELMO's supply chain is considered to be low.

ELMO sources goods and services from reputable suppliers and performs supplier reviews prior to the procurement of software-related services. ELMO will not knowingly support a supply chain where we are aware or have reasonable grounds to believe that slavery and human trafficking are taking place. Where ELMO has continued concerns about a supplier's practices in relation to modern slavery, ELMO will seek to terminate that business relationship wherever possible.

ELMO'S POLICY AND GOVERNANCE FRAMEWORK

ELMO's Code of Conduct sets out the Group's high standard of professional conduct and ethics in dealing with all of its stakeholders and its commitment to ensure compliance with all applicable state, national and international laws. ELMO's Whistleblower Policy allows employees to raise concerns about issues like modern slavery and human trafficking in a confidential manner. Both the Code of Conduct and Whistleblower Policy can be viewed on ELMO's website.

ONGOING MONITORING

ELMO is monitoring the development of laws and reporting obligations in respect of modern slavery and will reassess its approach to modern slavery reporting based on these requirements.

ELMO will continue to monitor the effectiveness of its measures to mitigate modern slavery and human trafficking in its supply chain in accordance with applicable laws and regulations.

APPROVAL

This statement was approved by the Board of Directors of ELMO Software Limited on 30th November 2020 and signed on its behalf by Danny Lessem.

[Note: the Australian Modern Slavery Act requires that the statement, even if voluntary, be approved by the Board and signed by their representative].



Danny Lessem

CEO and Executive Director, ELMO Software Limited