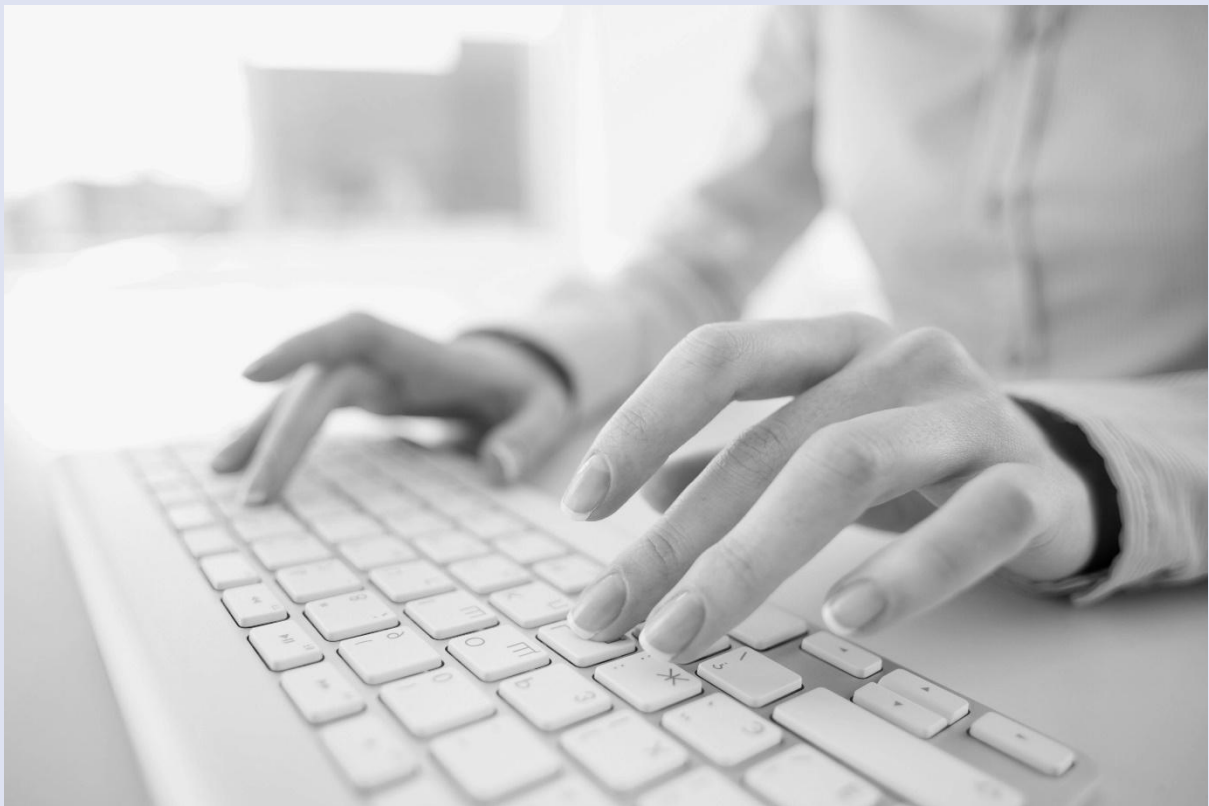


Modern Slavery Statement

Version 1.1 | 13 November 2023



I. REPORTING ENTITY

This modern slavery statement is made in compliance with the *Modern Slavery Act 2018* (Commonwealth) (the **Act**) on behalf of the relevant entities identified in Appendix A.

The reporting entities are referred to collectively in this statement as “ELMO” (**we/us/our**). This statement has been prepared in consultation with the above entities.

This modern slavery statement covers the period 1 July 2022 to 30 June 2023 (the **Reporting Period**).

I. ABOUT ELMO SOFTWARE

ELMO is a Software as a Service (**SaaS**) technology provider headquartered in Sydney, Australia. Founded in 2002, our mission is to unleash the impact of Human Resources (**HR**) – we empower our customers’ to fearlessly lead company decision making with technology, analytics, and data. In so doing, our vision is that our software will be the solution for HR to surface an organisation’s full potential through automation, analytics, intelligence, and partner expertise.

Our software modules include, amongst others:

- **HR Core:** digital tools that automate the management of human resources tasks, such as employee data management, leave approvals, performance management, learning management, and compliance.
- **Payroll:** digital solution that automates the process of calculating and managing employee payroll. It automates tasks such as calculating employee salaries, taxes, deductions, and tracking time off.
- **Recruitment:** digital solution that automates the recruitment process, from opening a job requisition and posting an advert to sourcing candidates, screening resumes, scheduling interviews, and generating contracts.
- **Onboarding:** digital solution that automates the employee onboarding process, from collecting new hire information to managing paperwork, preparing a welcome schedule, and providing access to training for new employees.

ELMO’s values are four-fold – to seek out different, obsess over customers, help others thrive and be fearlessly optimistic. In living these, we are committed to ongoing compliance, outstanding corporate citizenship, and to working to mitigate



the risks of modern slavery and human trafficking in our business operations and supply chains.

II. ELMO'S STRUCTURE, OPERATIONS AND SUPPLY CHAIN

ELMO has approximately 550 employees worldwide. As a provider of cloud-based HR & payroll software, ELMO's supply chain predominantly consists of the engagement of third-party service providers and the procurement of software-related products to support our service offering.

A number of our products have been developed in-house however, from time-to-time, ELMO will partner with external software providers to build out our customer offering.

As part of our business operations, we engage suppliers from the following core areas:

- Personnel – e.g. employees, recruitment services and contractors;
- Professional Services – e.g. legal, insurance, marketing and auditors/accountants;
- IT Services – e.g. data centres, backup services, software/service subscriptions;
- Partners – e.g. integration services and reseller agreements;
- Office facilities – e.g. cleaners, electricity and landlords.

III. MODERN SLAVERY RISKS

ELMO recognises that modern slavery is a significant worldwide problem and commends the efforts of governments and the private sector to eradicate it. To that end, ELMO is committed to achieving the highest standards of quality and integrity in all our business operations, and we expect suppliers doing business with ELMO and our affiliates to share this commitment. We have a zero tolerance for any form of modern slavery in our business operations and we are fully committed to preventing and detecting it.

ELMO regularly evaluates risks linked to modern slavery and human trafficking that could be caused by, contributed to, or directly linked to our supply chains. Based



on our business model and geographic reach, we ultimately consider the risk of modern slavery in our operations and supply chain to be low given:

- our direct business operations do not involve manual labour processes but instead leverage the use of cloud-based software;
- we do not have vendor relationships with large manufacturing businesses where modern slavery has been found to be an issue; and
- we do not have intricate supply chains, with multiple contractor or subcontractor levels.

ELMO sources and directly hires our own full-time employees, which allows us control and oversight in managing the risks of modern slavery in our business operations. These engagements are governed by formal written contracts and overseen by experienced human resources professionals in countries including Australia, New Zealand, the United Kingdom, and the Philippines. We constantly strive to provide a respectful and safe working environment for all our personnel and have built a policy framework that has zero tolerance for any threats, violence, harassment or coercion.

Throughout the Reporting Period, we did not identify any instances of modern slavery in our business operations or supply chain. We are aware that inherent and potential risks of modern slavery and human trafficking could be present, particularly in certain geographic locations, and will continue to develop our actions and controls into the future to combat these risks.

IV. ACTIONS AND CONTROLS

ELMO has implemented various measures designed to identify risks of modern slavery in its business operations and supply chains. These are broken down in further detail below but include conducting due diligence with potential suppliers and vendors, requesting suppliers complete ELMO's questionnaire on modern slavery and human trafficking and providing internal training to all employees on modern slavery awareness.

A. DUE DILIGENCE

ELMO has engaged a third-party supplier to discuss options in implementing and automating our Modern Slavery Questionnaire and anticipated Supplier Code of Conduct into our procurement process. This integration will interrogate potential



suppliers' modern slavery awareness, policy and controls before they are able to solidify their relationship with ELMO.

B. SUPPLIER QUESTIONNAIRE

ELMO has created a Modern Slavery and Trafficking Supplier Questionnaire containing questions to suppliers regarding the presence of modern slavery within their organisation, training, supplier engagement and the supplier's response process surrounding risks of modern slavery.

This questionnaire specifically asked our tier one suppliers if they were required to report under the Modern Slavery Act (Cth) 2018. This question allowed ELMO to identify the suppliers that would likely already have assessed the risk of modern slavery in their organisations, as to contribute to the completion of their own modern slavery statement required under the Act.

In relation to the presence of modern slavery, ELMO's questionnaire asked suppliers to identify the level of visibility they have over their supply chain,

We provided this questionnaire to our tier one suppliers and received 70% of responses prior to the end of FY23, which consisted of the completed questionnaire and copies of the supplier's modern slavery statement and / or modern slavery policy (where available).

ELMO reviewed these responses and did not identify any major modern slavery risks within our tier one suppliers. We consider our actions to be effective but have set a goal to improve responsiveness and widen the scope of recipients to our tier two suppliers.

C. TRAINING

ELMO has created a mandatory training course to ensure our people can help us prevent modern slavery in our operations and supply chains. We monitor, report and manage mandatory training completion rates, as part of our compliance training governance framework.

ELMO assigned an internal training module and accompanying assessment to all Australian and New Zealand ELMO employees, entitled 'Modern Slavery Awareness'.



This module aims to help employees identify signs that may indicate that someone is a victim of modern slavery and to explain how to report any suspicions they may have regarding modern slavery practices in the organisation or supply chain.

Key content of this module includes:

- Definitions of modern slavery;
- Common signs of modern slavery;
- Employees' responsibilities;
- Modern slavery practices in HR operations;
- How to address modern slavery practices in recruitment;
- How to report modern slavery.

Upon completion of the content of this course, learners were tested on the learning outcomes identified at the outset of the module. By the end of the module, learners will be able to:

- Describe some of the different types of modern slavery;
- Identify signs of modern slavery in the organisation and supply chain should they arise; and
- Report suspected cases of modern slavery through appropriate channels.

We received a 93% completion rate of this training by 30 June 2023. ELMO aims to reach 100% completion of this training next year as well as provide access to this training to overseas employees and further materials and training surrounding modern slavery awareness.

V. ACTION PLAN MOVING FORWARD

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. We aim to:

- Develop a Modern Slavery Policy;
- Develop and implement a Supplier Code of Conduct;



- Implement our modern slavery questionnaire into our procurement process platform;
- Provide continued and updated training to all employees within the ELMO Group.

VI. CONSULTATION

ELMO is required to consult with its owned and controlled entities under the *Modern Slavery Act (Cth) 2018*. We have consulted with our owned and controlled entities as part of our process in preparing this statement. This included providing the directors of those ELMO Group entities with information about ELMO's obligations under the modern slavery legislation and our reporting process.



APPROVAL

This statement is made pursuant to section 14 of the *Modern Slavery Act (Cth)* 2018. It constitutes the statement of each of the reporting entities set out in the 'Reporting entities covered by the statement' section for the year ended 30 June 2023 and has been approved by the Board of ELMO on 8 November 2023. The statement in its entirety is signed below.

A handwritten signature in black ink, appearing to be 'J. Haslam', written over a dashed horizontal line.

JAMES HASLAM (**on behalf of the Board of Directors**)

CFO - ELMO Software Pty Limited



APPENDIX A

Entity	Identifier	Registered Jurisdiction
ELMO Software Pty Limited	ABN 13 102 455 087	Australia
Pivot Remesys Pty Ltd	ABN 85 615 913 687	Australia
Webexpenses Pty Ltd	ABN 11 609 537 877	Australia
Vocam Pty Ltd	ABN 19 331 898 382	Australia
Breathe Software Pty Ltd	ABN 27 643 981 579	Australia
HR Onboard Pty Ltd	ABN 40 156 667 364	Australia
The Trustee for the Hero Brands Trust	ABN 27 885 167 045	Australia