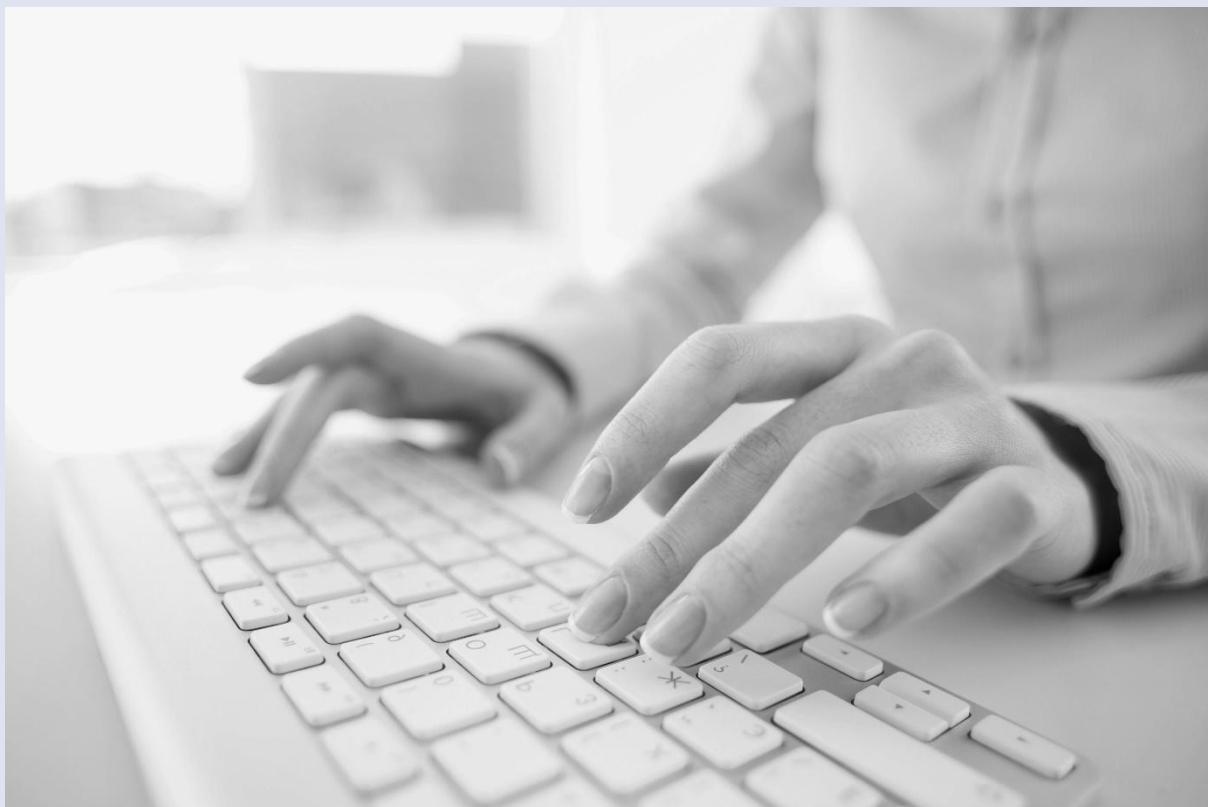




# Modern Slavery Statement

Version 1.3 | December 2025



## I. REPORTING ENTITY

This modern slavery statement is made in compliance with the *Modern Slavery Act (Cth) 2018* (the **Act**) on behalf of ELMO Software Pty Ltd (**ELMO**). ELMO's company details are provided in Schedule A to this statement.

This modern slavery statement covers the period 1 July 2024 to 30 June 2025 (the **Reporting Period**).

## I. ABOUT ELMO

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 reimagine what's possible, 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 400 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;
- Open source solutions – e.g. development and testing tools;
- Partners – e.g. integration services and reseller agreements; and
- 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 linked to our supply chains. Based on our business model and geographic reach, we 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**

At ELMO, we are dedicated to identifying and mitigating modern slavery risks within our operations and supply chains. Building on the measures implemented last year, we've strengthened our due diligence processes and awareness initiatives.

These are broken down in further detail below but include completing due diligence on all our current supplier chains and vendors and ensuring a comprehensive understanding of their modern slavery risk profiles. For suppliers without an existing modern slavery statement, we issued ELMO's modern slavery questionnaire to gather essential information and assess their practices. Internally, we reinforced our commitment through modern slavery awareness training for all ELMO employees, ensuring our staff understand their role in identifying modern slavery. These efforts, alongside our established supplier code of conduct, underpin our ongoing commitment to ethical practices.

##### **A. DUE DILIGENCE**

We made significant progress this Reporting Period in mitigating modern slavery risks within our operations and supply chains. This included intensifying the screening and qualification of our suppliers, categorising them as either high/medium-risk or low-risk for modern slavery.

Our low-risk suppliers typically focus on highly skilled, intellectual property work (like open-source tools) and rely on a global community of IT developers as opposed to manual labour. Their modern slavery risk is inherently low due to transparent, decentralised development models and adherence to ethical labour practices.

All suppliers identified as at high or medium risk for modern slavery were found to be compliant through one of the following means: they were a reporting entity under modern slavery legislation, they had voluntarily published a modern slavery statement, or they had satisfactorily responded to ELMO's modern slavery questionnaire.

To maintain an up-to-date and accurate record of our suppliers' modern slavery standing, their compliance information is captured and maintained within our Central Supplier Register. This ensures critical data is centralised, ensuring we have a clear overview of each supplier's status. We proactively review each supplier's compliance annually to ensure ongoing adherence to our standards. Furthermore, we conduct an immediate review whenever significant changes to our relationship with a supplier occur, such as contract renewals, expanded services, or any other material shifts that could impact their modern slavery risk profile.

## **B. SUPPLIER QUESTIONNAIRE**

ELMO has developed and continuously refines its Modern Slavery Supplier Questionnaire to ensure its adherence to current legislation and best practice. This questionnaire is a key tool in our due diligence process, and this reporting period, we distributed it to all 'at risk' suppliers who had not published a modern slavery statement.

The questionnaire is designed to gather critical insights into our suppliers' operations. Specifically, it addresses:

- The level of visibility suppliers have over their own supply chains.
- Confirmation of compliance with all applicable anti-slavery and human trafficking laws.
- Details regarding their employment terms and conditions for employees.
- Whether training on modern slavery is provided to their employees.

- How they assess all prospective suppliers for modern slavery risks.
- Their response processes in place for identified modern slavery concerns.
- Their due diligence activities to prevent and mitigate modern slavery risks.

ELMO reviewed all responses received and did not identify any modern slavery risks within these segments of our supplier base.

### **C. INTERNAL TRAINING**

The ELMO Content and Compliance team has developed a mandatory Modern Slavery Awareness training course. This module is reviewed and updated annually to ensure all content remains accurate and up-to-date with current legislation and best practice.

The training is delivered to all ELMO employees through our internal Learning Management System and is released annually. We monitor, report, and manage completion rates as part of our robust compliance training governance framework, with completion tracked and recorded by our Legal & Risk department.

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 and its various types.
- Common signs of modern slavery.
- Employees' responsibilities in combating modern slavery.
- Understanding modern slavery practices in HR operations.
- Strategies for addressing modern slavery practices in recruitment.
- Guidance on how to report modern slavery.

To enhance learning, the course also includes real-life scenarios and a final quiz to assess learners on the identified learning outcomes. By the end of the module, employees will be able to:

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

During this reporting period, we achieved a 91% completion rate for this training by June 2025, reflecting our employees' strong commitment to this key initiative. We note that the outstanding 9% of employees who have not completed the training

are presently on approved extended leave, including maternity leave and long service leave, and will undertake the training upon their return.

#### **D. Supplier Code of Conduct**

Continuing our commitment from last year, ELMO maintains a Supplier Code of Conduct (Code). This Code sets out ELMO's expectations and requirements for suppliers providing goods and services to ELMO and its subsidiaries (if goods and services are provided in Australia) or ELMO Software Limited New Zealand (if goods and services are provided in New Zealand). The Code includes specific requirements for our suppliers to comply with all applicable labour, human rights, and modern slavery laws.

#### **V. ACTION PLAN MOVING FORWARD**

ELMO continuously monitors developments in relevant legislation and reporting obligations, and our approach to modern slavery reporting is reassessed based on these evolving 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. Looking ahead, we are committed to several key initiatives:

- Publishing our Supplier Code of Conduct on the ELMO website.
- Continuing to screen both existing and new suppliers and vendors for their modern slavery compliance.
- Continue to review and monitor our Modern Slavery processes and procedures.
- Continuing to provide and update internal training to all employees within the ELMO Group.

#### **APPROVAL**

This statement is made pursuant to section 14 of the *Modern Slavery Act (Cth)* 2018. It constitutes the statement of the reporting entity set out in Appendix A for the financial year ending 30 June 2025 and has been approved by the Board of ELMO on 9 December 2025. The statement in its entirety is signed below.



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JOSEPH LYONS (**on behalf of the Board of Directors**)

**CEO - ELMO Software Pty Ltd**

**APPENDIX A**

<b>Entity</b>	<b>Identifier</b>	<b>Registered Jurisdiction</b>	<b>Registered Address</b>
ELMO Software Pty Ltd	ACN 102 455 087	Australia	Level 27 580 George Street Sydney NSW 2000