



Modern Slavery Act Statement

March 2017

Our statement

One of our fundamental principles is our commitment to run our organization responsibly. We maintain high ethical standards within our organization and in the provision of services to our customers.

Our business and supply chain

Lumesse is an HR software vendor whose solutions support both HR processes and people. We have a team of more than 550 people based in 20 offices around the world, with headquarters in the UK. We provide Human Capital Management solutions to more than 2,000 organizations in over 70 countries enabling them to engage and nurture the best talent in an ever-changing and demanding global environment. We work with data centre suppliers at the highest standards to supply services to our customers.

Our position on Modern Slavery

We do not use, or accept, forced, bonded, and involuntary or child labour. We only work with people who choose to work for us. We strive to develop our staff continuously and welcome people to speak up about any unethical behaviour. Our business practices and values reflect this.

We review our policies when required to ensure that they are in line with market best-practices and our business values and ethics. Policies are communicated during the onboarding process and when policies are updated.

Our governance and standards

Policies are reviewed and authorised by our Management Board. Our policies underpin our core Lumesse values, (including acting with integrity). Management monitors adherence closely and contraventions to these standards leads to immediate corrective action as defined in our policies and procedures.

We review the risk profile of our suppliers in order to focus our efforts. Some suppliers present a higher risk of slavery because of their location and/or type of service they provide.

During 2016 we analysed our direct suppliers to identify the areas with the highest risk of modern slavery and human trafficking. We found the highest risk in the provision of 3 services:

- ◆ Development services;
- ◆ Catering services in our offices;
- ◆ Cleaning services in our offices.

We are developing a program to address the risks of slavery and human trafficking beyond our direct suppliers.

Continuous improvement

Policy compliance is monitored as follows:

- ✦ HR teams monitor the completion of mandatory training as part of our onboarding process;
- ✦ Supplier compliance is monitored by our Finance and Legal departments;
- ✦ Our management board reviews key risks.

The output from policy compliance and review is used to update our policies.

Approved by the Board of Directors and signed off on its behalf



Didier Bench

(Executive Chairman)