



MODERN SLAVERY STATEMENT

# CREATING A BETTER WORLD OF WORK

DECEMBER 2023

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## ACKNOWLEDGEMENT OF COUNTRY

Culture Amp was founded on the lands of the Wurundjeri people and we now have employees all over the world including from our offices located in the traditional lands of the Wurundjeri, Munsee Lenape, Ohlone, and Potawatami and Kickapoo people.

We acknowledge the Traditional Custodians of these lands and pay our respects to their Elders, past and present, and emerging.

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## A MESSAGE FROM OUR CO-FOUNDER AND CEO

*"A better world of work starts with a better world.*

*From creating the best possible employment environment for those who already have work, to creating a world where every person has access to meaningful employment - we see an opportunity to strive for change across the spectrum.*

*Culture Amp is deeply committed to ensuring that our impact is both positive and sustainable. We stand with the efforts of the Modern Slavery Act (2018) and are focused on the responsibility we have to those we employ, the customers we serve, the suppliers we engage and the world of work at large."*

Dider Elzinga

Co-Founder & CEO  
Culture Amp

## ABOUT THIS STATEMENT

This Modern Slavery Statement ("Statement") covers the activities of Culture Amp Pty Ltd (ACN 138 600 987) for the financial year ending 30 June 2023 ("Reporting Period"). This is the second statement provided by Culture Amp under the Australian modern slavery reporting regime.

This Statement applies to Culture Amp Pty Ltd headquartered in Melbourne, Australia and its related entities, Culture Amp Ltd (UK), Culture Amp Inc (US) and Culture Amp GmbH (Germany) who are the employing entities in their relevant jurisdictions and have the same governance structure as Culture Amp Pty Ltd.

This Statement outlines the actions Culture Amp has taken to identify and address modern slavery risks in our operations and supply chain. It applies to and describes the steps taken by Culture Amp to seek to minimise the risk of modern slavery occurring in Culture Amp's operations or supply chains.



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## ABOUT CULTURE AMP

Culture Amp's mission is to create a better world of work.

In 2009, the business started as an organizational feedback tool and has gone on to become the world's leading platform for understanding what matters to companies and their employees - and what to do about it.

Since Culture Amp launched, the employee experience industry has also come of age. After a complex set of social and economic challenges in recent years, people and culture issues have become increasingly important and dynamic. Employees interact with their workplaces and each other in new ways, and wellbeing, diversity and inclusion are more important than ever. Culture Amp is in the prime position to help companies focus on improving the employee experience for greater impact.

Further, with the economic challenges across the globe, organizations are now focusing on choosing fewer vendors, but expecting and asking them to do more in order to continue the partnership. This expectation includes both the provision of products and services, and the responsible impact a business can have on the community within which it operates.

Our effort must extend to the company's interconnected network of vendors and suppliers, and where possible and relevant, our customers' networks also.



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## OUR CULTURE & VALUES

Culture Amp's culture is anchored in its values. We have four values:

- have the courage to be vulnerable;
- amplify others;
- trust people to own their decisions; and
- learn faster through feedback.



By living our values, we drive performance that is impactful and sustainable. Culture Amp creates a better world of work for our customers, community and our own team. Financial metrics are part of our performance, but it's not the end goal in itself.

Addressing modern slavery goes to the heart of the Culture Amp values - a better world of work is a world where modern slavery no longer exists and everyone has access to fairly compensated, equitable and safe work.

As Culture Amp grows, we will give back - as a business, this is our broader commitment to the community where we expressly make efforts toward equity, sustainability and social progress. This Modern Slavery Statement is one part of giving back. We welcome feedback on how we can continue to improve into the future.

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## WE GIVE BACK

Since its inception, Culture Amp has been a company with the good of others in mind. In 2017, Culture Amp became a B-Corp solidifying our commitment to using business as force for good. We were also one of the founding signatories of the 1% pledge and in 2023 launched the Culture Amp Foundation.

To build a better world of work, that world needs to be attainable - for everyone. The Culture Amp Foundation will bridge the gap caused by long standing, generational disadvantages and attainability at work by investing in anti-poverty, education and skill development for underrepresented peoples. We will make a difference by providing grants and services to organizations committed to making systemic changes, which will impact the ability for every human to have access to a survivable, flourishing and empowering workplace.

We want to ensure that other organizations working to build a better world can afford and access Culture Amp's tools, especially those that wouldn't otherwise be able to. That's why we created a non-profit grant program for organizations that primarily support Black and Indigenous people, or are focused on issues that disproportionately affect these communities. Black and Indigenous-owned organizations that are customers of Culture Amp receive a 38% discount on the standard price for our products. This discount not only represents the largest discount we currently offer our for-profit customers but also reflects the 38% wage gap between Black women and White men. In addition, we provide a 10% discount on our products for all B-Corps, to support those of our customers who share the same sustainability mindset as our own.

We are always striving become a more equitable organization, which means being an anti-racist one. Kevin Wiggins, the Special Advisor to our first Anti-Racism Plan, has helped us to understand what's possible. His heart and dedication are our inspiration for continuing this work. We want to ensure that other organizations working to build a more anti-racist world can afford and access Culture Amp's tools, especially those that wouldn't otherwise be able to. That's why we've created a non-profit grant program for organizations that primarily support Black and Indigenous people, or are focused on issues that disproportionately affect these communities. In December 2020, we launched our Racial Justice NFP Grant Program in honor of the impact he has had on Culture Amp.





## CULTURE AMP'S STRUCTURE, OPERATIONS & SUPPLY CHAIN

### STRUCTURE

Culture Amp Pty Ltd ("Culture Amp") is an Australian private company headquartered in Melbourne, Australia. Culture Amp has wholly owned subsidiaries Culture Amp Inc (USA), Culture Amp Limited (UK) and Culture Amp GmbH (Germany) who share the same governance structure as Culture Amp. As these subsidiaries are wholly owned by the reporting entity Culture Amp, the operations and supply chains of these subsidiaries are addressed in this statement. All Culture Amp subsidiaries follow policies as set and directed by Culture Amp.

### OPERATIONS

Culture Amp is an employee experience platform. We empower our people to deliver on the promise of a platform that helps people worldwide build profitable, sustainable, and human-literate companies. This drives everything we do. Our mission goes beyond just building a business tool. It includes a commitment to providing the education and support our customers need to bring a culture-first approach to their own organization.

Over 6500 customers around the world power their employee experience with Culture Amp. As the global platform leader for employee experience, Culture Amp empowers companies of all sizes and industries (and over 13 million employees) to transform employee engagement, develop high performing teams, and retain talent via cutting-edge research, powerful technology, and the largest employee dataset in the world. The most innovative companies across the globe, such as Salesforce, Unilever, PwC, KIND, SoulCycle, and BigCommerce depend on Culture Amp everyday.

A SaaS company with a highly skilled professional workforce, Culture Amp has around 1000 team members worldwide which is predominantly made up of permanent employees, and a small proportion of contractors.

### SUPPLY CHAIN

Culture Amp's suppliers are primarily located in Australia and the US with the majority of supplier spend in four main categories:

- Technology - software, hardware, infrastructure, security & cloud hosting
- Professional Services - consulting fees, specialist & admin support
- Marketing - advertising, events, merchandise sponsorships
- Facilities - office rent, maintenance of offices

## MODERN SLAVERY RISKS

### BUSINESS OPERATIONS

Culture Amp's core business is the creation and delivery of online services which presents, generally, low operational Modern Slavery risks.

Culture Amp's workforce predominantly consists of professionally qualified and highly skilled services workers directly employed by the business in countries with a high level of employment and workers' rights.

In April 2022, Culture Amp was named in the Australian Financial Review's Best Places to Work list, at number 4 on the Technology list. The AFR Boss Best Places to Work awards recognise organizations that are pioneering new ways of working and pushing the boundaries when it comes to workplace policies and practices.

Later in 2023, Culture Amp was named in the top 25 organizations that go above and beyond the call of duty to deliver an outstanding workplace experience for their people, judged by Inspiring Workplaces. These awards celebrate the success and diverse range of technologies that are believed to be a serious catalyst to driving positive change for an organization and the people within it.

### SUPPLY CHAIN & PROCUREMENT

As an online services business, Culture Amp's supply chain risk profile is lower than other businesses of a similar size in other sectors or industries. Our initial assessments of our supply chain found that the majority of Culture Amp's supply chain consists of technology products and services that support the delivery of our platform to our customers. In this initial assessment, Culture Amp considered factors such as:

- Sector and industry risks
- Product and services risks
- Geographic risks
- Onward supply chain model risks

Culture Amp did not find any material risks within its supply chain and determined its overall risk to be low with the majority of Culture Amp's suppliers operating in low risk industries and jurisdictions.

While Culture Amp's initial assessment determined its overall risk to be low, we acknowledge that managing Modern Slavery risks requires constant vigilance and Culture Amp is committed to continuous and ongoing improvement in the way it manages these risks.





## CONTROLS & ACTIONS TO MITIGATE RISKS OF MODERN SLAVERY

### TRAINING

Culture Amp has begun and maintains training of its team members to help identify and manage Modern Slavery risks.

Culture Amp is particularly focused on training programs, policies and processes to ensure continual diligence and improvement with regard to our business practices and managing Modern Slavery risks with key procurement and internal stakeholders.

### GOVERNANCE

Culture Amp established its Modern Slavery Risk governance structure. Key stakeholders who will be involved in the governance and management of Modern Slavery Risks on an ongoing basis include the Culture Amp Finance, Risk, Security and Legal teams with key matters noted or escalated to Culture Amp's Audit and Risk Management Committee as required on a monthly basis.

### POLICIES & PROCESSES

Culture Amp has implemented new policies and controls in its procurement and supply chain so that relevant stakeholders are supported and empowered to engage with suppliers that meet their needs in accordance with the values that Culture Amp expects of its supply chain while also appropriately managing Modern Slavery risks.

As part of Culture Amp's new Modern Slavery risk management process, Modern Slavery risk reviews are conducted by procurement stakeholders at Culture Amp which includes a Modern Slavery Questionnaire to be completed by prospective suppliers. The Culture Amp team will use these reviews to assess controls and risks (e.g. policies, training, geographic risk, industry risk).

If the prospective supplier is assessed to have adequate management of Modern Slavery risks, then they are onboarded. If a prospective supplier is assessed as not having adequate management of Modern Slavery risks, the Culture Amp team will engage in further consultation with the prospective supplier to uplift the supplier's management of these risks. Where this further consultation is conducted, a subsequent review is completed and escalated to the governance team at Culture Amp responsible for overseeing organizational risk, and either the prospective is onboarded (in the case where the uplift is acceptable) or rejected.





## CONTROLS & ACTIONS TO MITIGATE RISKS (CONT'D)

### CODE OF CONDUCT

The Culture Amp Code of Conduct has been updated to address Modern Slavery; diversity, equity and inclusion; and sustainability risks where it is a requirement for employees and contractors to assess the quality and integrity of any service or supplier prior to engagement. Our Code of Conduct can be found [here](#).

Culture Amp also requires that suppliers uphold the standards set within our Code of Conduct or have a substantially similar code of conduct approved by Culture Amp that upholds the values we expect from our suppliers.

### WHISTLE-BLOWING

Our whistleblowing policy reflects our commitment to ensuring employees and contractors are aware that they may raise modern slavery concerns or issues through the whistleblowing procedure.

Transparency and accountability are important to us - the Whistleblower hotline is one of many tools available to employees, including contractors, to report issues they may otherwise be reluctant to bring forward or do not feel comfortable to discuss through other forums.

Culture Amp's Whistleblower Hotline is an internet and telephone-based tool operated by an independent third party, Convercent, that allows employees to confidentially and anonymously report concerns ("make a disclosure") about actual or suspected issues, including potential misconduct, involving Culture Amp.

### CONTRACTUAL CONTROLS

We have developed a suite of contractual clauses and controls for inclusion in our agreements with suppliers that aim to manage our supply chain Modern Slavery risks.

## CONTROLS & ACTIONS TO MITIGATE RISKS (CONT'D)

### VALUES

Culture Amp has four values that drive organizational culture.

- Courage to be vulnerable
- Amplify others
- Trust others to own decisions
- Learn faster through feedback

Our values are how we achieve impactful and sustainable performance. For Culture Amp to truly be values-driven, we ensure that our values are clear, embedded, and lived. The Culture First Blueprint is an artifact that lays out what it means to be Culture First and live by the values at Culture Amp. The intent of the Blueprint is to provide all employees with a shared understanding and shared language for what it means to be Culture First, and a shared understanding for how we work together. It also outlines key activities that we need to deliver to bring Culture First to life.

When employees start their career at Culture Amp they are educated about what Culture First means and the values that underpin our business. Each year, we also ensure that each Culture Amp employee undertakes further training on the Culture First Blueprint, galvanizing how to embed the right behaviors in their daily work in order to make the biggest impact in the most sustainable way.



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## EFFECTIVENESS OF ACTIONS & CONTROLS

Culture Amp conducts annual internal audits and is developing an evaluation framework to review the actions within this Statement with a commitment to continuous improvement.

Results from our internal audits and evaluation will feed into Culture Amp's overall risk management framework to ensure that risks are appropriately managed and appropriate action is taken to so that Culture Amp can continue to be more effective at managing Modern Slavery risks.



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## CONSULTATION & APPROVAL

*This Statement is made pursuant to the Modern Slavery Act 2018 (Cth). The Statement has been developed through consultation with the relevant stakeholders within Culture Amp Pty Ltd and its wholly owned and controlled subsidiaries.*

*This Statement has been approved by the Culture Amp Board and signed by Culture Amp's Chief Executive Officer*

*Didier Elzinga  
Co-Founder & CEO  
Culture Amp*