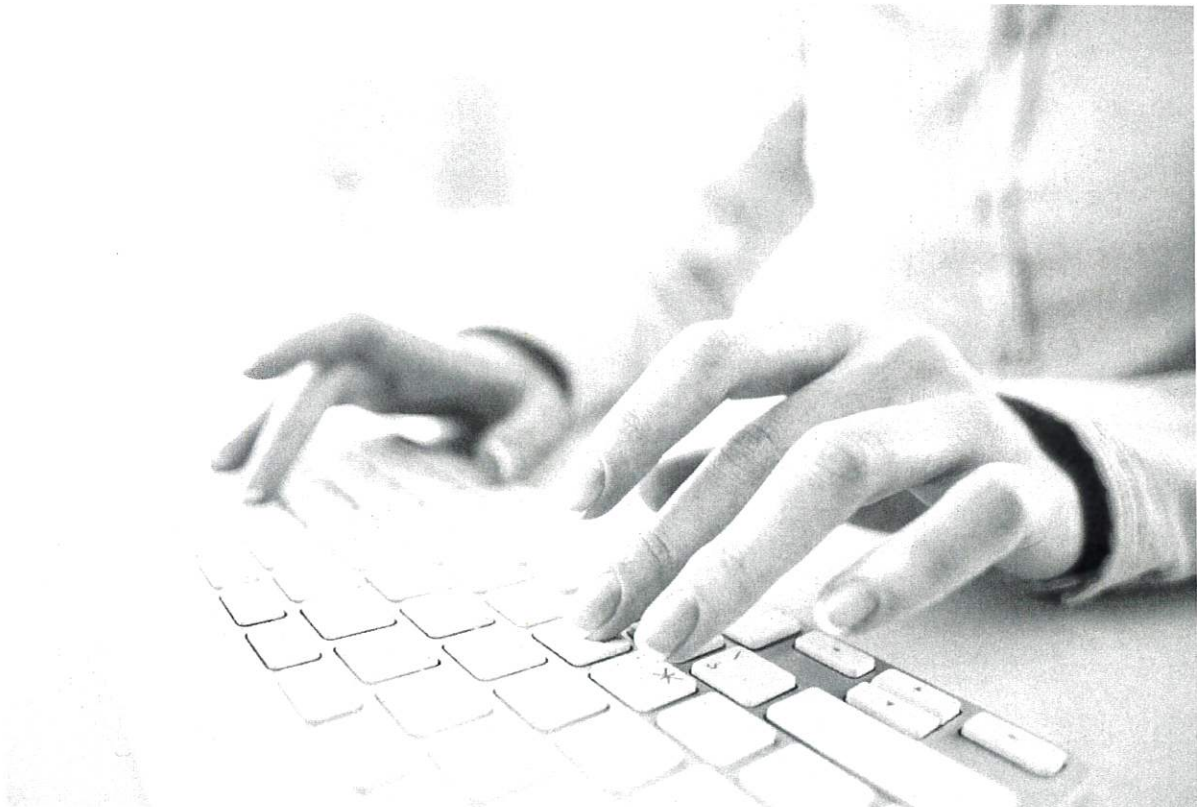




# Modern Slavery Statement

Version 1.2 | November 2024



## I. REPORTING ENTITY

This modern slavery statement is made in compliance with the *Modern Slavery Act (Cth)* 2018 (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 2023 to 30 June 2024 (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 seek out different, obsess over customers, help others thrive and be fearlessly optimistic. 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. 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.

Several of our products have been developed in-house however, from time-to-time, ELMO will partner with external software providers to enhance 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 global problem and commends the efforts of governments and the private sector to eradicate it. 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 detecting and preventing 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 gives 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.

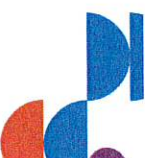
Throughout the Reporting Period, we did not identify any instances of modern slavery in our business operations or supply chain. We are aware of the inherent risk of modern slavery and human trafficking, particularly in certain geographic locations, and will continue to develop our actions and controls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

#### **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, providing internal training to all employees on modern slavery awareness, and creating and implementing a supplier code of conduct.

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

ELMO has implemented our Modern Slavery Questionnaire and Supplier Code of Conduct into our procurement process. This has ensured that potential suppliers



are aware of ELMO's expectations before they are able to solidify their relationship with ELMO.

## B. SUPPLIER QUESTIONNAIRE

ELMO has developed a Modern Slavery and Trafficking Supplier Questionnaire (the **Supplier Questionnaire**) which requires our suppliers to disclose the measures they are taking to identify modern slavery risks in their supply chains.

Throughout the Reporting Period we reviewed the Supplier Questionnaire, updated the questions, and added additional queries as we built on our knowledge from the previous reporting period.

The Supplier Questionnaire was sent to both Tier One and Tier Two ELMO suppliers this Reporting Period, expanding on its scope of application from last reporting period (where it was only sent to the Tier One suppliers).

The Supplier Questionnaire specifically asked our suppliers if they were required to report under the Modern Slavery Act (Cth) 2018. This enabled us to identify those suppliers that were subject to modern slavery legislative requirements.

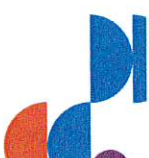
ELMO received 86% of the Supplier Questionnaire's returned prior to the end of the Reporting Period. This included completed questionnaires, as well as any responses where a copy of the supplier's modern slavery statement and / or modern slavery policy were provided to ELMO.

The response rate to the Supplier Questionnaire has improved since the last reporting period (where a 70% completion rate was recorded), demonstrating a stronger engagement between ELMO and its suppliers on this issue.

ELMO reviewed all responses received and did not identify any modern slavery risks within our Tier One and Tier Two suppliers. We consider our actions to be effective but have set a goal to improve responsiveness and widen the scope of application to all suppliers next reporting period.

## C. TRAINING

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





ELMO's content and compliance team review and update this training module to ensure all content remains accurate and up to date.

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 assessed on the learning outcomes identified at the outset of the module. By the end of the module, learners will be able to:

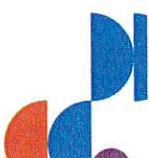
- Describe some of the different types of modern slavery;
- Identify signs of modern slavery in the organisation and supply chain should they arise; and
- Report suspected cases of modern slavery through appropriate channels.

We received a 96.31% completion rate of this training by 30 June 2024. This figure has improved in comparison to last year's figure of 94%.

ELMO aims to achieve a 100% completion rate next reporting period as we continue to develop modern slavery awareness within the business.

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

In line with ELMO's statement last year, we have developed a Supplier Code of Conduct (Code). This Code sets out ELMO's expectations and requirements for Suppliers providing goods and services to ELMO Software Pty Ltd and its subsidiaries



(if goods and services are provided in Australia) or ELMO Software Limited (if goods and services are provided in New Zealand).

## **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 look forward to:

- Improving our Modern Slavery policies and procedures;
- Form a Modern Slavery Action Plan;
- Continue to provide and update the internal training to all employees within the ELMO Group.

## **VI. CONSULTATION**

ELMO is required to consult with its owned and controlled entities under the Act. 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.



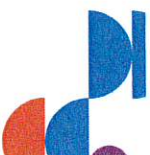
**APPROVAL**

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 Appendix A for the financial year ending 30 June 2024 and has been approved by the Board of ELMO on 29 November 2024. The statement in its entirety is signed below.

  
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2/12/24

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

**CEO - ELMO Software Pty Ltd**





## APPENDIX A

Entity	Identifier	Registered Jurisdiction
ELMO Software Pty Ltd	ACN 102 455 087	Australia
Pivot Remesys Pty Ltd	ACN 615 913 687	Australia
Vocam Pty Ltd	ACN 070949 601	Australia
Breathe Software Pty Ltd	ACN 643 981 579	Australia
HR Onboard Pty Ltd	ACN 156 667 364	Australia
The Trustee for the Hero Brands Trust	ABN 27 885 167 045	Australia