

Modern Slavery Statement

Rimini Street, Inc
CY2020

This statement covers the activities of Rimini Street, Inc (ABN 61 898 632 956) (**Rimini Street**) and its owned and controlled entities during the calendar year ended 31 December 2020.

This is our first modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions Rimini Street has taken to assess and address modern slavery risks in our operations and supply chains.

This statement was approved by the Board of Rimini Street on 28 October 2021.

About us

Rimini Street is an enterprise software support company, established in 2005 and incorporated in the United States of America. Our registered office is located at 3993 Howard Hughes Parkway Suite 500, Las Vegas NV 89169, United States of America. Rimini Street is listed on the Nasdaq Stock Market (NASDAQ: RMNI).

Our [Code of Business Conduct and Ethics](#) outlines the Core Values and the principles that we expect all of our people to observe. Our Core Values are a uniting force which connect us across functional areas, business units and geographies. Most importantly, our Core Values enable us to make a positive difference among our stakeholders, including our clients, business associates, stockholders, communities and each other.

Our Core Values are:

- **People** – We treat everyone with respect and communicate clearly, openly and honestly.
- **Integrity** – We act with integrity in all we do.
- **Accountability** – We uphold our commitments.
- **Client-Centric** – We consider client interests in every decision.
- **Innovation** – We drive continuous improvement, evolution and disruption of status quo in everything we do.
- **Trustworthy** – We earn trust through consistent, reliable and high-quality execution.
- **Profitability** – We strive for long-term, sustained profitability that benefits all stakeholders.
- **Community** – We give back to the communities in which we work, live and serve clients.
- **Fun** – We take time to celebrate our successes together as a team.

At Rimini Street, we take our ethical and legal obligations seriously. We recognise the importance of maintaining and promoting fundamental human rights in our operations around the world. We implement and maintain programs and policies that:

- Promote a workplace free of discrimination and harassment.
- Prohibit child labour, forced labour and human trafficking.
- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws.
- Provide humane and safe working conditions, including safe housing conditions, where applicable.
- Recognise employees' right to freedom of association and collective bargaining.

Our structure

Rimini Street owns or controls a number of entities. The subsidiaries of Rimini Street during the 2020 calendar year included:

- RSI International Holdings, Inc;
- RSI International Holdings, LLC;

- Rimini Street Australia Pty Limited;
- Rimini Street GmbH;
- Nihon Rimini Street KK;
- Rimini Street (HK) Ltd;
- Rimini Street Ltd;
- Rimini Street AB;
- Rimini Street Israel, Ltd;
- Rimini Street Brazil Technical Services Ltda;
- Rimini Street India Operations Pvt. Ltd;
- Rimini Street Korea, Inc;
- Rimini Street (HK) Ltd Taiwan Branch;
- Rimini Street France SAS;
- Rimini Street Singapore Pte. Ltd;
- Rimini Street New Zealand Ltd;
- Rimini Street de Mexico, S. de R.L. de C.V.;
- Rimini Street Malaysia Sdn Bhd;
- Rimini Street Netherlands B.V.;
- Rimini Street FZ, LLC;
- Rimini Street Poland; and
- Rimini Street Canada Inc.

Please refer to Exhibit 21.1 of the [Rimini Street Annual Report year ending 31 December 2020](#) for further details of Rimini Street's owned and controlled entities.

Our operations

Rimini Street is a global leader in independent, third-party enterprise software support services, serving over 4,200 clients to date. Rimini Street's services replace traditional vendor support and enable licensees of Oracle, SAP, Microsoft, IBM, and other enterprise software to save up to 90% on total software support costs, obtain greater value from their enterprise software investments and create growth.

Rimini Street offers a variety of enterprise software support services, including technology support, product and security support, innovation and roadmap, archiving services, risk avoidance, and account management, as well as providing international legal, tax and regulatory update services.

Our core operations and principal offices are located in Las Vegas, Nevada. However, we also conduct operations internationally in Hong Kong, the United Kingdom, Australia, New Zealand, the United Arab Emirates, Malaysia, Mexico, the Netherlands, Brazil, Germany, France, Poland, Sweden, Taiwan, Japan, South Korea, India and Singapore. Globally, we have over 1,500 employees.

Our supply chain

We have identified our significant suppliers that support us in operating our business and in this first statement conducted detailed risk assessments of these suppliers. While many of our suppliers are located or headquartered in the United States of America, we also work with suppliers in other countries all around the world including the United Kingdom, Australia, China, India, France, Singapore, Philippines, South Korea, Africa, the Middle East and Ireland.

The key types of goods and services that form our supply chain are:

- software and IT services;
- professional services (e.g. legal, accounting, audit, tax);
- contract labour;
- financial services;
- marketing services;
- IT devices and infrastructure; and
- employee benefits providers.

We also have various indirect suppliers, including IT hardware, office supplies, cleaning services and facilities management for our offices globally.

We engage our suppliers across a variety of arrangements. Our significant suppliers are generally engaged on the basis of long term, stable arrangements.

Modern slavery risks

We recognise that any exposure to modern slavery risk may impact our business operations and would be inconsistent with our Code of Business Conduct and Ethics. We endeavour to take responsibility for reducing the risk that we might cause, contribute or be directly linked to modern slavery through our operations and supply chains. Rimini Street is committed to continually reviewing and enhancing our approach to managing modern slavery risks and we expect our suppliers to adhere to our Supplier Code of Business Conduct and Ethics.

Risk assessment methodology

For this reporting period, we undertook a risk assessment of the modern slavery risks within our operations and supply chains to evaluate the risk that we are causing, contributing to or directly linked to modern slavery practices. We adopted a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, type of products and services, geographical location and specific entity risk.

Our initial risk assessment has indicated that our operations and supply chain have a low / medium potential for modern slavery risks. Our risk profile is summarised in the table below.

Risk profile

Risk	Description of risk	Classification
Sector / Industry	Internationally, the electronics industry, encompassing IT hardware, is recognised as a high-risk industry. However, the majority of our suppliers operate within the professional services and technology industry. These sectors ordinarily have a low level of risk associated with modern slavery practices and are not comprised of positions that are vulnerable to human trafficking or associated practices.	Low
Product / Service	We determined that the risks associated with any specific product or service should be assessed as low for the CY2020 period. This is as a result of the profile of our core suppliers who predominantly specialise in software, technology, professional services and financial services. We have minimal exposure to suppliers with cyclical production and/or high-risk raw material usage to manufacture the products and services consumed by Rimini Street.	Low
Geographic	As our suppliers are predominantly headquartered or located in the United States of America and the United Kingdom, our geographic exposure risk to modern slavery practices during the period was deemed low.	Low / Medium
Specific Entity	There were no specific entities identified during the period that we deemed as having significant risks associated with modern slavery practices.	Low / Medium
COVID 19 risks	As a result of the COVID-19 pandemic, Rimini Street experienced limited disruption to its supply chains as the majority of our suppliers maintained sophisticated business continuity arrangements (being operators within the technology, financial services, software and other professional services industries).	N/A

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. That is why during our first reporting period we introduced a number of steps to assess and address modern slavery in our operations and supply chains.

We plan to conduct further detailed risk profiling in CY2021 of our supplier arrangements as part of a broader program of work. Where required, a detailed questionnaire will be issued to our suppliers.

Due diligence

While Rimini Street does not “manufacture” in the traditional sense with the use of factories, Rimini Street evaluates its supply chain to identify which suppliers pose risk in terms of complying with relevant laws, including but not limited to laws relating to slavery and human trafficking.

Rimini Street requires that all of its suppliers and partners comply with all applicable laws including, but not limited to, employment laws, anti-corruption laws and any other laws that broadly regulate how people work. We may also carry out appropriate due diligence and audits on suppliers to ensure their compliance with such laws.

As noted above, we undertook a risk assessment for this reporting period to identify any key modern slavery risks that existed within our operations and supply chains and we conducted desk-top research to better understand our key risk areas.

We further considered our key supply relationships, based on an assessment of where we had the greatest leverage to mitigate the potential modern slavery risks that existed in the relationship.

Governance and accountability framework

The Board of Rimini Street, and its dedicated Board Committees, recognise the importance of maintaining high standards of governance and regularly reviewing governance practices. At Rimini Street, all directors, officers and employees are responsible for upholding and maintaining our values. Our Corporate Governance Guidelines are set out on our website.

During the CY2021 reporting period, we will consider the inclusion of modern slavery risks as part of a broader periodic review of our corporate governance documents and our existing policies and practices.

Policies and procedures

At Rimini Street, we select our suppliers based on objective criteria, such as quality and total cost of service. We believe in doing business with suppliers who embrace and demonstrate our high standards of integrity and ethical business conduct. We expect others working with or on Rimini Street’s behalf, including suppliers, to act ethically and in a manner consistent with our Supplier Code of Business Conduct and Ethics.

Under our Code of Business Conduct and Ethics, in evaluating and hiring suppliers or other third parties to work on behalf of Rimini Street, our employees are required to take reasonable steps to ensure these suppliers and third parties have a reputation for integrity and act in a responsible manner consistent with our ethical standards.

Under our Supplier Code of Business Conduct and Ethics, we require our suppliers to adhere to a range of standards in relation to social and working conditions including those relating to certain recognised forms of modern slavery. For example:

- **Child Labour:** Suppliers must comply with the minimum age requirements as prescribed by applicable laws and regulations. Suppliers must adhere to our contracts or other applicable supplemental guidelines which may provide standards at a higher level. Suppliers must not interfere with a child’s education by employing a child in violation of a country’s compulsory education laws. Supplier may use legitimate, voluntary workplace apprenticeship programs, such as student internships, as long as they comply with all laws and regulations. Workers under the age of 18 must not be asked or required to perform work that is likely to jeopardise their health, safety or well-being.

- **Forced Labour:** Suppliers must use only voluntary labour. Any form of forced labour, including bonded, indentured, or involuntary prison labour is prohibited. Human trafficking and trafficking-related activities are also prohibited, including using misleading or fraudulent recruitment practices, charging recruitment fees, denying employee access to their identity documents, failing to provide return transportation costs or an employment agreement (if required) in the employee's native language.
- **Freedom of Association:** Suppliers should respect employees' right to freedom of association including the right to collectively bargain, consistent with local laws and ensure that all employee relationships are of a voluntary nature. Employees must not be subject to intimidation or harassment in the exercise of their right to join or to refrain from joining any organisation.
- **Harassment and Discrimination:** Suppliers must promote a work environment free from verbal, physical, or mental abuse, threats, violence, or any form of harassment during employment or recruitment. Similarly, Suppliers must not engage in unlawful discrimination in hiring and employment practices such as promotions, rewards and access to training. Employees must not be subject to discrimination based on, but not limited to, to non-job-related characteristics such as: race, colour, ancestry, citizenship, national origin, religion, veteran status, disability, medical condition, genetic characteristic or information, age, gender, sexual orientation, gender identity or expression, sex, creed, marital status, family status, pregnancy, or other legally protected status.
- **Hiring and Termination:** Suppliers must comply with applicable laws governing eligibility for employment, recruitment, and termination. Suppliers must not knowingly employ individuals who are not authorized to work, as determined by governing law.
- **Wages, Benefits, and Working Hours:** Suppliers must comply with all applicable laws governing wages, benefits, and working hour requirements, including compensation, benefits, and overtime. Accurate written records of employees' regular and overtime hours should be maintained.

The development of this modern slavery statement for the CY2020 builds upon our existing UK Modern Slavery Act Statement and enhances our commitment to addressing modern slavery risks in our business and driving accountability for ethical business practices across our organisation.

Training

During this reporting period, Rimini Street offered employee onboarding and annual refresher training on a number of company policies and procedures, including on our Code of Business Conduct and Ethics. Within our Code of Business Conduct and Ethics, readers are also referred to our Supplier Code of Business Conduct and Ethics.

COVID-19

The COVID-19 pandemic has brought further challenges to modern slavery and highlighted social and economic inequalities worldwide. At Rimini Street, in response to the COVID-19 pandemic we provided special compensation bonuses for lower-paid employees and for our employees who tested positive for COVID-19. The business was not required to make any significant changes to its operations in response to the pandemic that would heighten exposure to modern slavery risks.

Additionally, Rimini Street liaised with its material suppliers throughout the COVID-19 pandemic including with respect to their approach to managing staff and the effects of the pandemic.

Assessing our effectiveness

We are committed to ensuring the effectiveness of our actions by regularly reviewing our modern slavery processes. On an annual basis, our senior management team will conduct meetings to evaluate whether we are appropriately identifying and managing our modern slavery risks. Additionally, when engaging a new supplier, Rimini Street will assess whether our existing risk management processes remain appropriate.

We are monitoring our performance against a number of key performance indicators to assess the effectiveness of our actions. These include:

- the extent of compliance with our Supplier Code of Business Conduct and Ethics; and
- the number of suspected modern slavery incidents identified. At Rimini Street, we have a dedicated Compliance Helpline for reporting incidents of non-compliance across a range of

areas. The helpline provides a mechanism by which complaints can be made and directed to relevant business units to address. The process for logging and referral of complaints will identify any complaints made that specifically relate to modern slavery matters. The helpline is available anywhere in the world by phone using a special toll-free telephone number based on the country from which you are calling. In the United States, the relevant phone number is 844-754-3342. For a list of international country phone numbers, see the [Compliance Helpline](#) section of our corporate website or at www.RiminiStreet-ComplianceHelpline.com.

Consultation

During CY2020, there was consultation and collaboration between executives and senior management of Rimini Street in relation to human rights matters, specifically in the context of the Rimini Street board's decision to adopt a strengthened Code of Business Conduct and Ethics and Supplier Code of Business Conduct and Ethics. In developing this statement, Rimini Street engaged and consulted with each of Rimini Street's owned or controlled companies. We provided details of the reporting requirements in the *Modern Slavery Act 2018 (Cth)* and a draft of this statement to representatives of our owned or controlled entities who were invited to provide comments in response to the draft statement and to verify the accuracy of its contents.

Prior to being put to the Board of Rimini Street for review and approval, this statement was reviewed by: Seth Ravin, CEO, Michael Spencer, AGC and VP, Ethics and Compliance, Carlos Prado, Director - Rimini Street Brazil Serviços de Tecnologia Ltda., Suryanarayana Gadiraju Raju, Director – Rimini Street India Operations Pvt Ltd, Megan Long, Corporate Counsel, Ethics and Compliance, Phillip Gunderson, Compliance Analyst, Ethics & Compliance, Simon Philip, Director and Managing Counsel, Australia New Zealand and Gregory Shinsky, Corporate Counsel, Australia New Zealand.

CY2021 focus

As this is our inaugural statement, we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

In CY2021 our focus areas are anticipated to be:

- implementing Rimini Street's modern slavery framework and policy;
- implementing a supplier questionnaire for those suppliers identified as higher risk or potential flags;
- where practicable, implementing specific modern slavery clauses in supplier contracts;
- further integrating our modern slavery governance and compliance arrangements into Rimini Street's Risk Management framework; and
- considering the need for formal employee training on understanding how to identify modern slavery practices when engaging with our suppliers.

This statement was approved by the Board of Rimini Street in its capacity as principal governing body of Rimini Street on 28 October 2021. This statement was signed by Seth. A Ravin in his capacity as Chairman and Chief Executive Officer of Rimini Street.



Seth A. Ravin
Co-Founder, Chairman and Chief Executive Officer
Rimini Street, Inc
28 October 2021