

# Modern Slavery Statement

Rimini Street, Inc  
CY2022

This statement covers the activities of Rimini Street, Inc (ABN 61 898 632 956) (**Rimini Street**), a limited liability company, of 3993 Howard Hughes Parkway, Suite 500, Las Vegas, Nevada 89169, USA (ARBN 632 432 332 and its owned and controlled entities during the calendar year ended 31 December 2022.

This is our third modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out our ongoing commitment to acting ethically and with integrity in all our business dealings and relationships and implementing systems to address modern slavery risks in our own business or in our supply chain.

Rimini Street respects the international human rights principles encompassed by the United Nations Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labour Organisation's 1998 Declaration on Fundamental Principles and Rights to Work. Rimini Street fully supports the goals of anti-modern slavery laws around the world, including the reporting regimes set out in the Australian Modern Slavery Act 2018, the U.K. Modern Slavery Act 2015, and the California Transparency in Supply chains Act 2010. We strive to respect and promote human rights in accordance with the [United Nations Guiding Principles](#) on Business and Human Rights in our relationships with our employees, suppliers, and partners.

This statement covers the period 1 January 2022 to 31 December 2022 and was approved by the Board of Rimini Street on 2 May 2023.

## About us

Rimini Street, Inc. (Nasdaq: RMNI), a Russell 2000® Company, is a global provider of enterprise software products and services, the leading third-party support provider for Oracle and SAP software products and a Salesforce partner. The Company offers premium, ultra-responsive and integrated application management and support services that enable enterprise software licensees to save significant costs, free up resources for innovation and achieve better business outcomes. To date, more than 5,000 Fortune 500, Fortune Global 100, midmarket, public sector, and other organizations from a broad range of industries have relied on Rimini Street as their trusted application enterprise software products and services provider

As an IT services company focused primarily on providing services, we face substantially less risk than many transnational companies, such as manufacturers and producers, regarding modern slavery and human trafficking, both of which are prohibited by our Code of Business Conduct and Ethics.

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 unifying 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.

We expect our suppliers and business partners to uphold these core principles, as reflected in our "Supplier Code of Business Conduct and Ethics" which is published in multiple languages on our business website.

Our Core Values are:

**Company** – Dream big, innovate boldly, and operate at the highest ethical, professional, and quality standards.

**Clients** – Improve client performance significantly.

**Colleagues** – Build a great company that attracts, develops, inspires, and retains extraordinary people.

**Communities** – Leave the world better than we found it.

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 several entities. The subsidiaries of Rimini Street during the 2022 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 2022](#) 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 5,000 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 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 1,920 employees.

### ***Our supply chain***

We have reconfirmed our significant suppliers that support us in operating our business and, in parallel to this third statement, will aim to work towards implementing a supplier questionnaire that seeks to gauge Modern Slavery and Human Rights risk within their respective organisation. 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 based on 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**

Rimini Street seeks to identify and minimise the risks of slavery and human trafficking in our supply chain and encourage our suppliers, as well as employees, to report any concerns regarding compliance with our Code of Business Conduct & Ethics. We have an established compliance “hotline” setup, which is available 24 hours a day for people to report their concerns.

### ***Due diligence***

While Rimini Street does not “manufacture” in the traditional sense with the use of factories, Rimini Street continues to evaluate 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 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.

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. Each of our business partners, including suppliers, are required to acknowledge our Supplier Code of Business Conduct and Ethics, setting out key rules and expectation when carrying on business with Rimini Street. One of which is the commitment to support human rights and avoiding complicity in human rights violations such as modern slavery.

### ***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 this reporting period, we reviewed the inclusion of modern slavery risks as part of a broader periodic review of our corporate governance documents and our existing policies and practices. We plan to conduct further reviews of our governance documents, policies, and practices in CY2023.

## ***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 global 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 CY2022 builds upon our CY2021 Modern Slavery Act Statement, as well as 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 several 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. From January 2023, all employees globally will be required to complete a yearly mandatory Business Conduct & Ethics training and certification.

## **Remediation**

If an incident of modern slavery was discovered in our supply chain, Rimini Street aims to promptly take such a discovery to the partner or supplier at issue. Rimini Street aims to work with the applicable partner or supplier at issue to remediate/remove any confirmed violation of the principles or terminate business with the partner or supplier at issue if the finding was disregarded or continued.

## **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 <https://riministreet.i-sight.com/portal>.

## **Consultation**

As noted above, all the operational policies and procedures of all companies within the Rimini Street group derive from our corporate US Headquarters and are applied consistently across all our operations. This ensures that all entities within the group understand the standards expected of them and are aware of the actions they need to take to ensure that risks of modern slavery in their operations and local supply chains have been identified, assessed and addressed.

For purposes of the Australian Modern slavery Act 2018, this statement was prepared in consultation with each of the abovementioned subsidiaries of Rimini Street and those subsidiaries have been given the opportunity to provide comments in response to the draft statement and to verify the accuracy of its contents (in so far as it concerns their own operations and supply chain).

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

## **CY2023 focus**

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 CY2023 our focus areas are anticipated to be:

- enhancing Rimini Street's modern slavery framework and reviewing our policy.
- implementing additional supplier due diligence review for those suppliers identified as higher risk or potential flags as part of vendor risk management
- ongoing efforts to integrating our modern slavery governance and compliance arrangements into Rimini Street's Risk Management framework; and
- a general review of our procurement contracting practices.

This statement was approved by the Board of Rimini Street in its capacity as principal governing body of Rimini Street on 2 May 2023. This statement was signed by Seth A. Ravin in his capacity as Chairman, President and Chief Executive Officer of Rimini Street.



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Seth A. Ravin  
Co-Founder, Chairman, President and Chief Executive Officer  
Rimini Street, Inc  
2 May 2023