

MODERN SLAVERY STATEMENT



YEAR ENDED 31 DECEMBER 2020

Our businesses and supply chain

Jonas Software UK supplies industry leading enterprise management software and related services to over 25 vertical markets around the world, these include; manufacturing, retail, education, event management, club management, fitness & leisure, hotel & resorts, hair & beauty, marina management, metal service centres, managed print services and payment processing.

Jonas Software UK refers to Jonas Computing (UK) Limited, Gladstone Limited and all of its UK subsidiaries. Jonas Computing (UK) Limited's and Gladstone Limited's immediate parent company is Constellation Software UK Holdco Ltd and its ultimate controlling party is Constellation Software Inc.

Jonas Software UK is a collective of 38 businesses that operate within 2 UK Groups, the Vesta Group and the Jonas Group. The businesses have their own autonomy to make operational decisions and control their own commercial processes at a business level. Our main supplier costs relate to hosting and maintenance costs, followed by hardware costs.

Our policies

We have a number of policies in place which help us mitigate the risks to Jonas Software UK. These include:

- Disciplinary policy
- Equal opportunities & dignity at work policy
- Grievance policy
- Whistle blowing policy

We also have the Employee Handbook which aggregates a number of best practices and policies, including; ethical and moral obligations expected, equal opportunity and diversity, discrimination, bullying and harassment, criminal offences, health & safety, employee well-being, grievances, whistleblowing and disciplinary procedures. In addition to this, we have a dedicated on-line zone which focuses and provides resources and support for health & wellbeing.

Our risk assessment

During our risk assessment we have reviewed the internal policies and processes that we have in place to enable us to assess our internal suppliers. Jonas Software UK operates a central HR function, which is conducive to strong and clear controls. Our external suppliers are engaged at a business unit level, and historically, a group level understanding of these suppliers has been harder to see and has therefore posed a higher risk. The in-depth understanding of our external suppliers at a group level was agreed to be our critical action point to address immediately.

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Due Diligence and auditing

During the year we engaged with third party risk management specialists, with the objective of finding a suitable software provider who could help us set up an effective central library of suppliers across all of our businesses and to provide us with a streamlined and automated process for assessing the risk in our direct suppliers, and also our fourth party suppliers.

Post year end this was progressed and a project with Prevalent was initiated, tailoring a third-party risk system around Jonas Software UK and the Modern Slavery Act 2015. Within this system we set up a procedure to internally assess the risk of our suppliers and detailed external assessments for our suppliers who we deem higher risk. Where high risk suppliers are identified, appropriate investigation and remediation will take place.

Key performance indicators (KPIs)

Jonas Software UK operates internally on a number of key KPIs. In addition to these, a number of new KPIs have been introduced for the 2021 year end to ensure we can measure and understand our progress, focusing on key risks. These KPIs include specific targets on bringing each of our business units' suppliers into our new supplier software, completing our internal risk assessments, any relevant external assessments for those considered high risk and then any final remediation required.

Training

Training was rolled out during 2020 to ensure all employees were cognisant of the Modern Slavery Act and understood what they should be aware of to help mitigate any risks. All new recruits are required to complete this training as part of our onboarding process and training requirements are reviewed on a regular basis.

Board approvals

This statement is made pursuant to section 54(1) of the Act. Jonas Software UK's Executive Committee approved this statement in December 2021.

DocuSigned by:

A handwritten signature in black ink, appearing to read "Scott Saklad".

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Scott Saklad

Group CEO, Jonas Software UK & Europe