MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction from Tim Fox, Director

Software AG (UK) Ltd is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business and to provide a work environment that is free from human trafficking and slavery.

We will not tolerate or condone human trafficking or slavery in any part of our global organization. This statement is consistent with Software AG's Global Code of Business Conduct and Ethics ("Code of Conduct") which sets forth fundamental principles of law and ethics governing the way that Software AG does business. This Code can be found on www.softwareag.com.

Software AG strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. Our expectations for responsible, ethical and legal conduct are applicable to all parties who work on behalf of Software AG worldwide, including, but not limited to, its employees, partners, contractors, and other representatives that act on behalf of Software AG, and to its vendors and suppliers.

Software AG is and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organization or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Organizational Structure and Background

Software AG (UK) Ltd is a provider of digital software for business processes across a range of sectors, including banking, finance, education, telecom, transportation/logistics, energy and utilities, government, insurance, manufacturing and retail. We are a part of the Software AG Group, established in 1969, and our ultimate parent company is Software AG with its head office in Darmstadt, Germany. We have over 180 employees in the UK. The Group has over 4,500 employees worldwide and operates in more than 70 countries in North & South America, Europe, Middle East & Africa, and Asia.

Our business is organised into 4 business units: Go to Market (consisting of Sales, Pre-Sales and Marketing); Research & Development; Professional Services (delivery); and Business Support (back office).

Our Colleagues

Software AG operates a rigorous recruitment selection process for all hiring decisions which includes obtaining documented proof of the individual's right to work in the country in which they will be employed. We will always pay at least the minimum wage rate applicable in the geography in which they work.

Software AG aims to ensure that all our people are treated fairly and with compassion and dignity throughout their employment and our Code of Conduct provides clear guidance on the standards of behavior expected from all employees across all areas of business.

Software AG has established a Compliance Board to implement and monitor the company's compliance programme. It reviews and evaluates compliance issues and concerns within the organization and enforces that employees are in compliance with the law, that internal policies and procedures are being followed, and that whistleblowers are protected.

Our Supply Chain and Risks:

Software AG has zero tolerance to slavery and human trafficking and requires its supply chain suppliers to observe all applicable laws and conduct business in an ethical and responsible manner.

Our major suppliers are generally large multinational companies who have their own ethical standards of behavior in place. Our spend commitments are with third parties in IT, marketing, real estate, facilities and professional services, and are made using written contracts. We do not pay cash for services.

We have not identified any instances of modern slavery occurring in our supply chain and therefore it can be difficult to measure the effectiveness of our policies in reducing the risk of slavery and human trafficking.

To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a supply chain compliance programme. This consists of our Supplier Code of Conduct, which all suppliers are required to adhere to.

Where they have their own code, we have an internal checklist to ensure that it covers the same criteria as ours, specifically, but not solely, in the areas of: Employee Conduct; Child & Forced Labour; Discrimination; Employment Rights; Compensation & Working Hours; Protection of Health & Job Safety; Environmental Protection; Corruption & Bribery; Supplier Relationships.

We also have a Supplier Code of Conduct enforcement guideline. The Compliance Board reserves the right to periodically review the existence of the signed "Supplier Code of Conducts", and the Purchasing Department is required to report any supplier who does not comply with our Supplier Code of Conduct after several requests to the Compliance Board.

Training

All Software AG employees take mandatory online training on our Code of Conduct, and an assessment must be completed to ensure understanding and acceptance of the policy. Individual assessments are tracked and monitored until successful completion.

Our effectiveness in combating slavery and human trafficking

As stated above, we have not identified any instances of modern slavery occurring in our supply chain and therefore it can be difficult to measure the effectiveness of our policies in reducing the risk of slavery and human trafficking.

As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Suppliers Code of Conduct.

We will continue to assess whether circumstances warrant the inclusion of specific anti-slavery and human trafficking language in any of our policies governing business conduct.

Signed for and on behalf of Software AG (UK) Limited

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Tim Fox
Director