



## Modern Slavery Act

### Transparency Statement

#### About us

We are the leading software provider of solutions dedicated to the financial industry with recognized expertise in Alternative Investments and Risk Management. Our solutions serve major companies in the Private Equity, Real-Estate Investment, Banking, and Insurance sectors. We work with more than 850 clients in over 48 countries.

#### Our business and supply chain

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 ("Act"). We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. We will not support or deal with any business involved in slavery or human trafficking.

#### Our Policies, procedures and trainings

Considering that we are a software provider and that we base our business on professional workforce operating from an office environment, we do not find our employees to be vulnerable from the offences listed in the Part 1 of the Act. However, and especially bearing in mind the gravity of the subject, we are uncompromising in our expectations of ethical behavior by our employees, partners, and suppliers. Therefore, we adhere very strictly to the principles and rules of our Code of Business Conduct and Ethics, of which our Anti-Slavery Policy forms an integral part. In accordance with this Policy, all of those working for us or under our control have the responsibility to prevent, detect and report modern slavery in any part of our business or supply chains. Any violation or suspected violation of Anti-Slavery Policy including the Modern Slavery Act, must be reported immediately through our established internal reporting mechanisms. In addition, all eFront employees must attend a yearly training reminding them of the importance of their obligation to remain compliant with this legislation at all times.

#### Next steps

We have a zero-tolerance approach when it comes to modern slavery, human trafficking and the violation of human rights. We will continue to monitor the steps that we currently take in regard to this subject.

#### **eFront Limited**

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Registration No: 03650489 [www.eFront.com](http://www.eFront.com)



### Responsibility

The Audit and Risk Committee has overall responsibility for ensuring that our Code of Conduct and Ethics, as well as this statement comply with our legal and ethical obligations, and that all those under our control comply with it.

This statement is published on behalf of eFront Ltd and all references to “we”, “all”, “our” or “us” refer to eFront Ltd.

This statement has been approved by the Board of Directors at the board meeting on June 28<sup>th</sup>, 2018.

Signed:

A handwritten signature in blue ink, appearing to read 'Olivier Dellenbach', written over the printed name.

Olivier Dellenbach

Executive Chairman

eFront Ltd

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