



MODERN SLAVERY ACT 2015: SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. INTRODUCTION

- 1.1 This statement is made in accordance with Section 54 of the Modern Slavery Act (the “Act”) as it applies to iManage LLC and iManage EMEA Limited (together, “iManage”), commercial organizations that carry on business in the UK.
- 1.2 This statement sets out the steps which iManage has taken during the financial year ending 31 December 2021 to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains.

2. BUSINESS AND SUPPLY CHAIN

- 2.1 iManage is the leading provider of work product management solutions for law firms, corporate legal departments, and other professional services firms such as accounting and financial services.
- 2.2 iManage’s products are sold directly by iManage and through relationships with hundreds of channel partners. iManage has approximately 900 employees and is headquartered in the United States. iManage has eight offices and a number of product development centres around the world, including in the United States, the UK, Toronto, and India.
- 2.3 As an office-based software company and employer of predominantly professionally qualified and highly skilled people, the risk of modern slavery and human trafficking existing within our business is considered low. Nonetheless, we apply robust policies and procedures concerning employment screening (including work eligibility checks).
- 2.4 We follow the UN Global Compact’s 10 principles, and our actions demonstrate our support of, and respect for, internationally recognised human rights. We also promote ethical values, which is reinforced by our global employment and labour policies, such as those relating to inclusion & diversity.
- 2.5 Our supply chain relates to our office-based software business – supplying personnel, goods, and services to support the work product management solutions we provide to our clients, and we do not operate any manufacturing facilities. We seek to establish and maintain relationships with our suppliers with a view to ensuring that all elements of our supply chain act in accordance with applicable laws, our values and ethical business principles.

3. RISK ASSESSMENT

- 3.1 We continue to develop our risk-based approach to avoid modern slavery occurring in our supply chains. This includes informing our suppliers of iManage’s obligations and the ethical standards expected of them. We review our procurement practices, systems, and controls to further identify, assess and monitor potential risk areas in our supply chains, and identify ways to further mitigate the risk of slavery and human trafficking occurring in our supply chains. We incorporate appropriate clauses on modern slavery in supplier contracts where applicable. Suppliers are expected to take all reasonable steps to ensure that slavery, servitude, human trafficking, forced labour and/or child labour do not take place in its supply chains and/or in any part of its business, and suppliers are expected to notify us if they become aware of any such circumstances.
- 3.2 Our overall objective is to establish and maintain relationships with our suppliers that will minimise the risk of slavery or human trafficking occurring within our supply chains. Our approach is guided by the UN Guiding Principles on Business and Human Rights, and we provide a set of key principles that underpin the minimum standards we expect from our suppliers.
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4. POLICIES ON SLAVERY AND HUMAN TRAFFICKING

4.1 Code of Conduct

4.1.1 iManage's global Code of Conduct is reviewed annually and was last updated in May 2021. The Code of Conduct outlines our commitment to observing the highest ethical standards that guide our business practices across a number of areas, including in relation to modern slavery and human trafficking. The Code of Conduct has been communicated to all our staff (including through dedicated training). We take a zero-tolerance approach to slavery and human trafficking and encourage employees to report any concerns immediately.

4.2 Supplier Code of Conduct

4.2.1 Our relationships with our suppliers are required to be fully transparent, ethical and in line with the standards expected of our own employees. To this end, we have a Supplier Code of Conduct, which includes details of our standards on issues such as slavery, human trafficking, forced labour and child labour.

4.3 Anti-Bribery and Corruption Policy

4.3.1 We also have an Anti-Bribery and Corruption Policy that aims to ensure that our business is conducted in an ethical and responsible manner and that employees are able to voice any concerns they may have securely and confidentially.

5. TRAINING

5.1 Information on modern slavery is included in our global Code of Conduct and related training. This training takes place annually and is obligatory for all employees, including our sales, marketing, legal, procurement and finance teams.

6. FURTHER STEPS

6.1 We will continue to review and develop policies and supplier processes across our business as best practice matures to ensure a robust and consistent approach to supply chain risks. We will continue to make all efforts to identify any significant risks in our supply chain and implement any actions appropriate or necessary directly with suppliers.

Ray Scheppach

Raymond Scheppach, Chief Financial Officer and Assistant Secretary

iManage LLC

Date: 22 April 2022

Ray Scheppach

Raymond Scheppach, Director

iManage EMEA Limited

Date: 22 April 2022