



Modern Slavery Act 2015 (“the Act”) Modern Slavery and Human Trafficking Statement

June 2019

Introduction

Aptitude Software Group plc (“**Aptitude**”) and its subsidiaries (“**Aptitude Group**”) are committed to improving our practices to combat slavery and human trafficking. We recognise that modern slavery is a crime and a violation of fundamental human rights. We have established, and are working to develop further, systems and controls to help us to ensure that modern slavery is not taking place anywhere in our own organisation or in any of our supply chains.

The Aptitude Group's business structure

As at 31 December 2018, Aptitude was the owner of two leading software businesses – Aptitude Software and Microgen Financial Systems.

Aptitude Software serves enterprise CFOs in a range of industries, helping them to streamline finance operations, address regulatory requirements and deliver strategic insights to their business leaders.

Microgen Financial Systems offers a range of financial services technology systems focused on the global Wealth Management sector and the UK payments market, and also provides Application Management services.

With a Premium Listing on the London Stock Exchange since 1974, Aptitude is a financially strong group providing innovative software solutions.

On 24 June 2019, Aptitude’s shareholders approved the disposal of the Microgen Financial Systems business and this transaction is due to complete on 28 June 2019. Following completion, Aptitude Group will be comprised solely of the Aptitude Software business. This statement is made with reference to Aptitude Group’s structure and turnover as at 31 December 2018, including the Microgen Financial Systems business.

Aptitude’s head office is in London. As at 31 December 2018, the Aptitude Group had more than 400 employees worldwide, with operations in the UK, USA, Singapore, Hong Kong, Poland, Guernsey, Jersey, Canada, Cyprus and Serbia (including the Microgen Financial Systems business).

In the financial year ended December 2018 the Aptitude Group had a global turnover of £70.3 million (including the Microgen Financial Systems business).

Our supply chains

Our supply chains both locally and internationally are relatively limited, consisting primarily of services, IT and office equipment and other goods which we require to run our offices around the world, such as suppliers of office equipment and furniture, stationery, and suppliers of cleaning and catering services. Our software is written by, and our services delivered by, our own employees and consultants who are engaged directly by us and based mainly in our own offices in the different territories where we operate. We do not outsource any of that work to third parties.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery and Human Trafficking Policy (“Policy”) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

We have reviewed our organisation and our supply chains, and we have considered the risk that modern slavery could arise. Due to the nature of our business and our direct relationship with our staff, we consider that the risk of modern slavery in our own organisation is relatively low. As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To help us to ensure that all those in our supply chain and consultants comply with these values we take a risk-based approach to our contracting processes. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Where appropriate (taking a risk-based approach) we will also require written confirmation from our Suppliers that they will comply with our Policy.

Where appropriate, we may also require employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Policy.

Monitoring Effectiveness

Compliance with our Policy is managed and monitored by a team which consists of involvement from the following departments:

- Legal
- Compliance
- Human resources
- Finance and Procurement
- Sales

We will review the effectiveness of our new Policy and the process referred to above, and will report regularly to our board of directors, when we will make recommendations on any additional steps which we believe will further mitigate the risk of modern slavery in our organisation and its supply chains.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Aptitude Group's slavery and human trafficking statement for the financial year ending December 2018.

A handwritten signature in black ink, appearing to read 'Philip Wood', with a stylized flourish at the end.

Philip Wood, Chief Financial Officer

Aptitude Software Group plc

26 June 2019