

Modern Slavery Act 2015 (“the Act”) Modern Slavery and Human Trafficking Statement: May 2021

Introduction

Aptitude Software Group plc (“Aptitude”) and its subsidiaries (“the 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 continue to develop, 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

Our purpose is to create a world of financial confidence for our clients. We do this by providing finance teams solutions to run their businesses, forecast the outcomes of decisions, and comply with complex regulations. For over 20 years we have maintained an absolute focus on the office of the CFO which has resulted in a unique mix of finance and technology expertise that we bring to our clients.

With a Premium Listing on the London Stock Exchange since 1984, Aptitude is a financially strong group providing innovative software solutions. This statement is made with reference to Aptitude Group's structure and turnover as at 31 December 2020.

Aptitude's head office is in London. As at 31 December 2020, the Aptitude Group had 332 employees worldwide, with operations in the UK, USA, Singapore, Hong Kong, Poland and Canada.

In the financial year ended December 2020 the Aptitude Group had a global turnover of £57.3 million.

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. 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 the various territories in which we operate. We do not outsource that work to third parties, but we do work with a partner network of advisory, consulting, integration and technology providers that provide complementary services and solutions to our clients.

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 engage closely with our suppliers and have internal procedures to ensure that appropriate due diligence is undertaken on these firms. Engagement with any new suppliers is subject to a formal process and requires final approval from an Executive Director. Significant supplier contracts of a recurring nature require approval from the Board as a whole. Suppliers are chosen according to their ability to meet the Aptitude Group's own high standards and to demonstrate values that are consistent with those of the Aptitude Group.

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. 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.

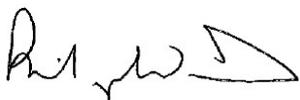
Monitoring Effectiveness

Compliance with our Policy is managed and monitored with involvement from the following departments:

- Commercial
- Human Resources
- Finance
- Company Secretarial
- Sales

We will continue to review the effectiveness of our Policy and the process referred to above, and report regularly to our Board of Directors, and 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 2020.



Philip Wood

Deputy Chief Executive Officer and Chief Financial Officer
Aptitude Software Group plc

26 May 2021