# 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 2015 (the "Act") as it applies to iManage LLC, iManage EMEA Limited, and RAVN Systems Limited, a wholly owned subsidiary of 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 2017 to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains.
- iManage is committed to compliance with the provisions of the Act and doing business responsibly, including improving our practices to combat and prevent slavery and human trafficking.

## 2. OUR 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 400 employees and is headquartered in the United States. iManage has five offices and a number of product development centres around the world, including in the United States, the UK 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. We also apply robust policies and procedures concerning employment screening (including work eligibility checks).
- 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. Some of our suppliers are local while others are engaged on a global scale. 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. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

- 3.1 We are in the process of updating our corporate policies to include a new Anti-Slavery and Human Trafficking Policy (the "Policy"). We are also in the process of introducing a supplier relationships policy that will include our requirements on issues such as slavery, human trafficking, forced labour and child labour. A breach of either policy, as applicable, would result in disciplinary action, and potential dismissal for an employee, and the likely termination of our relationship with a supplier.
- 3.2 Our Policy will be added to our suite of policies that affirm our commitment to responsible, sustainable and ethical business. Our policies focus on the core areas of equal employment, non-harassment, business ethics, and anti-corruption.

3.3 All those subject to the policies shall be encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains or those of any current or potential suppliers, at the earliest possible stage. iManage aims to encourage openness and will support anyone who raises genuine concerns in good faith under the policies, even if they turn out to be mistaken. Further, iManage is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. All notifications received, together with the identity of the notifier, will be treated as confidential.

# 4. RISK ASSESSMENT AND DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

4.1 We are in the process of carrying out a review of our network of suppliers and, based on their location and the nature of their business, identifying those which we consider might represent a higher risk. We shall be communicating with those suppliers to notify them of iManage's obligations under the Act and shall be requesting information and undertakings from those suppliers. In addition, we are in the process of reviewing our procurement practices and including additional requirements relating to modern slavery and human trafficking.

## 5. SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

- 5.1 We have zero tolerance of slavery and human trafficking. To ensure all those in our supply chain, including our contractors, comply with our ethics and ethical business principles, as stated above, we are in the process of introducing a supplier code of conduct.
- 5.2 We are also in the process of updating our standard supply chain contracts to include modern slavery compliance provisions. Additionally, if we were to identify any existing suppliers as high-risk, we will put in place relevant contract amendments to ensure compliance with our policies. Such amendments will bring the requirements in line with those introduced in our standard supply chain contracts.

#### 6. TRAINING

Over the next year, we plan to develop targeted training for personnel in roles relevant to our systems and controls to raise awareness of modern slavery issues and to take steps to ensure that slavery, forced labour and human trafficking do not take place anywhere in our business or supply chains.

### 7. FURTHER STEPS

7.1 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.

Raymond Scheppach, Chief Financial Officer and Assistant Secretary

iManage LLC

Date: February 23, 2018

Raymond Scheppach, Director

iManage EMEA Limited

Date: 23 February 2018

Raymond Scheppach, Director

**RAVN** Systems Limited

Date: 23 February 2018