MODERN SLAVERY STATEMENT

YEAR ENDED 31 DECEMBER 2023

Our businesses and supply chain

Jonas Software UK supplies industry leading enterprise management software and related services to over multiple vertical markets around the world, these include; fitness & leisure, hotel & resorts, hair & beauty, marina management, metal service centres, utility & infrastructure and payment processing.

Jonas Software UK refers to Jonas Computing (UK) Limited, Gladstone Limited and all of its UK subsidiaries, that are managed under the 'Jonas Software UK' brand. Jonas Computing (UK) Limited's and Gladstone Limited's immediate parent company is Constellation Software UK Holdco Ltd and its ultimate controlling party is Constellation Software Inc.

Jonas Software UK is a collective of 32 businesses. The businesses have autonomy to make operational decisions and control their own commercial processes at a business level. The main supplier costs relate to hosting and maintenance costs, followed by hardware costs. Our suppliers are predominately UK & Europe based, followed by North American. Supplier relationships are maintained at a business unit level.

Our policies

We have a number of policies in place which help us mitigate the risks to Jonas Software UK. These include:

- Disciplinary policy
- Equal opportunities & dignity at work policy
- Grievance policy
- Whistle blowing policy

We also have the Employee Handbook which aggregates a number of best practices and policies, including; ethical and moral obligations expected, equal opportunity and diversity, discrimination, bullying and harassment, criminal offences, health & safety, employee well-being, grievances, whistleblowing and disciplinary procedures. In addition to this, we have a dedicated on-line zone which focuses and provides resources and support for health & wellbeing.

Due Diligence and auditing

During our risk assessment we have reviewed the internal policies and processes that we have in place to enable us to assess our internal suppliers (our people). Jonas Software UK operates a central HR function, which is conducive to strong and clear controls.

Knowledge of our external suppliers are centralised at a UK level, within a central library and risk assessment system. Suppliers considered higher risk are classified as Tier 1 suppliers. External assessments are made to understand the processes in place and approach the Tier 1 suppliers take to mitigating their own risk of Modern Slavery. These assessments produce an automated risk score, to allow us to review and focus on any suppliers of concern, and to gain a high-level profile of Jonas Software UK.

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Our risk assessment

From the continued due diligence and assessment work undertaken, minimal percentage are considered Tier 1 suppliers, based on what we consider our higher risk criteria. Even less have high risk scores from the detailed assessments, which require follow-up.

Key performance indicators (KPIs)

Jonas Software UK operates internally on a number of key KPIs. There are specific KPIs to ensure we can measure and understand our progress, focusing on key risks. These KPIs include specific targets on bringing each of our business units' suppliers into our new supplier software, completing our internal risk assessments, any relevant external assessments for those considered high risk and then any final remediation required.

Training

Training was rolled out during 2024 to ensure all employees were cognisant of the Modern Slavery Act and understood what they should be aware of to help mitigate any risks. All new recruits are required to complete this training as part of our onboarding process and training requirements are reviewed on a regular basis.

Board approvals

This statement is made pursuant to section 54(1) of the Act. Jonas Software UK's Executive Committee approved this statement in August 2024.

DocuSigned by:

Darrell Boxall

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Darrell Boxall

Group CEO, Jonas Software UK & Europe