



Flexera Software Limited

Modern Slavery and Human Trafficking Statement 2017

About Flexera Software Limited

Flexera Software Limited (“**Flexera**”) is a private limited company registered in England under company registration number 06524874.

Flexera is a computer software company, with the aim of making buying and selling software more transparent, secure, and effective. Flexera provides a range of software products, solutions and services, including software asset management, software monetization and software security. Flexera is part of a multinational group of companies, whose parent company is based in Itasca, Illinois, and which has office locations throughout the USA, Europe and Asia-Pacific with more than 1,000 employees and over 80,000 customers worldwide.

Modern Slavery and Human Trafficking Policy

Flexera takes a zero-tolerance approach to violations of the Modern Slavery Act 2015 in any part of its business or in any of its supply chains and is committed to ensuring that there is no slavery or human trafficking present in either.

Our Standards of Business Conduct policy is made available and applies to everyone who works for us. The policy outlines how Flexera and its group of companies conduct business and describes Flexera’s fundamental shared values and commitment to ethical business practices and legal compliance. It also sets out processes and procedures for our employees to follow, including: whistleblowing; confidential reporting; and our commitment to follow all applicable wage, anti-discrimination and labour laws. All laws relating to the terms and conditions of employment, especially child labour, in any place where we do business, must be obeyed, including by our suppliers, agents or contractors. Every employee is required to read and confirm they understand Flexera’s Standards of Business Conduct policy.

Flexera’s Supply Chains

Our supplier agreements require our suppliers to both represent and warrant that they comply with all applicable federal, state and local laws. We expect our suppliers to establish their own policies and procedures to ensure compliance with all applicable laws and regulations. Should we become aware of any violations of law or issues related to slavery and human trafficking, we will consult with our Legal Department regarding any further action.

To date, Flexera has not identified any violations of the Modern Slavery Act in its business or supply chains.

Summary of Steps Undertaken and Planned Next Steps

In order to identify and address any issues related to modern slavery and human trafficking, Flexera has:

- sought professional advice regarding compliance with the Modern Slavery Act 2015 and preparing our Modern Slavery and Human Trafficking Statement;
- robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and checks to ensure everyone employed is aged 16 and above; and
- internal policies in place which address issues of wage and labour laws, including employee conduct and whistleblowing.



In line with our zero-tolerance approach to violations of the Modern Slavery Act 2015, and as part of our processes for contracting with new suppliers and renewing contracts with existing suppliers, where reasonably practicable and appropriate, Flexera will:

- encourage and support suppliers in their efforts to comply with the Modern Slavery Act 2015;
- terminate our relationship with existing suppliers if they or their contractors and suppliers tolerate slavery or human trafficking in any part of their business or supply chains; and
- include specific prohibitions in our contracts with our suppliers against slavery and human trafficking, including a right for us to terminate the arrangement if the supplier breaches its obligations under the Modern Slavery Act 2015.

Within our own organisation, Flexera will:

- update our due diligence procedures on suppliers and partners to identify modern slavery and human trafficking and address specific areas of risk;
- train our managers who are responsible for procurement of goods and services on our modern slavery and human trafficking policy; and
- include an anti-slavery certification within our existing Due Diligence questionnaire that all our partners and suppliers are required to complete, to ensure our partners and suppliers are aware of our requirement and expectation that they will comply with all anti-slavery and human trafficking laws.

This statement has been approved by Flexera's Board of Directors and is Flexera's Slavery and Human Trafficking Statement as required under the Modern Slavery Act 2015.

Joseph W. Freda

Joseph W. Freda (Feb 28, 2018)

.....
Director

Flexera Software Limited

February 2018