



Idox plc Modern Slavery Act Statement

FY23

The Modern Slavery Act 2015 (**MSA**) came into effect on 29 October 2015. This statement is made on behalf of Idox plc pursuant to section 54(1).

Idox plc is an international specialist software solutions provider with business carried on by Idox plc and its affiliated subsidiaries (**Idox**). The Idox plc affiliated entities covered under this MSA statement are: Idox Software Limited, EIM Group Ltd and Landhawk Software Services Limited.

This statement relates to actions and activities during the financial year ended 31 October 2023 and was approved by the boards of Idox and the above noted affiliated entities on 15 November 2023

Our approach to combating modern slavery

Idox is committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as contemplated by the Modern Slavery Act 2015 in any part of Idox business or in the supply chain.

In our policies, due diligence, contractual arrangements, training and reporting regimes, we are implementing and enforcing effective systems and controls to ensure that Modern Slavery is not taking place in any part of our business or in our supply chain.

Our Chief Legal & Corporate Officer works in conjunction with our Supplier Chain Manager, Legal, Bids and People teams to help ensure our compliance with the MSA.

We welcome the transparency encouraged by the MSA and this statement sets out for the public, and for our clients, suppliers and employees, the steps that Idox is taking in this regard across the whole group.



Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Policies	Relevance to MSA
Idox Group International Business Conduct Policy	Sets out policies and procedures which assists employees in resolving questions and in reporting suspected violations and is updated every year. It clearly sets out Idox's commitment to ensure employees are paid fairly and properly for their work and safeguards against slavery and human trafficking taking place anywhere in our business or supply chains. It also details Idox's ethical business conduct and equality and diversity policies.
Supply Chain Management Policy & Procedure	Sets out Idox's expectations in connection to supplier business practices. The Supply Chain Management Policy & Procedure establishes a standard approach with respect to behaviour, ethics and methods for engagement with suppliers, potential suppliers and with the Supply Chain Management function within Idox plc and all group companies.
Anti Corruption & Bribery	Sets out Idox's zero-tolerance approach and procedures to prevent and detect bribery and corruption.
Whistleblowing	Sets our standards for a fair and ethical workplace, for all employees to be confident in the knowledge that, if they consider it appropriate to raise a concern about suspected wrongdoing or dangers in relation to Idox activities, they can report this without fear of retribution and will be supported by Idox. This policy sets how employees can raise concerns and protection and support for whistleblowers.



Supplier due diligence

Idox is committed to ensuring transparency within its supply chains. All new suppliers are required to agree to comply with applicable laws and regulations, and Idox's Code of Conduct as stated in the Idox New Supplier Form.

The Supply Chain Manager oversees and records responses from suppliers as part of the onboarding process. As part of Idox's efforts to continually improve processes, the due diligence procedure is under strategic review to implement a proportionate risk management system.

The Group has adopted a risk-based approach to the assessment of our business and supply chain through our supply chain management policy, which has involved taking geographical, industry and market factors into account in order to identify categories of supply that may present a higher risk of modern slavery being present. Given the nature of what we do, we believe that there is a low risk of slavery or human trafficking having a connection with our business activities.

Idox employees are expected to adhere to the Supply Chain Management Policy & Procedure in business dealings with suppliers and potential suppliers.

Supplier obligations

Idox is committed to acting ethically and with integrity, and expects the same approach to any form of modern slavery from its suppliers. Approved and onboarded suppliers should meet the code of conduct based on ethical, social, environmental, health & safety and labour standards (available on the Idox website). Idox has the discretion to assess whether suppliers should adhere to additional requirements.

Training and raising awareness

All Idox employees are required to undertake compliance courses on Preventing Corruption including anti-bribery laws and conflicts of interest. These e-learning courses are mandatory as part of our induction training with refresher courses required to be completed by all employees annually. Compliance checks are carried out by the People Team to ensure all employees are correctly enrolled. We have a 100% compliance rate on the courses being completed. This training is supplemented by periodic communication throughout the year to raise awareness of potential threats or risks. We also incorporate Diversity, Equality and Inclusion training modules in our annual roll out which encourages employees to build an inclusive place of work.

Employee Engagement surveys are carried out regularly to allow us to better understand thoughts and feelings across the group with feedback showing that employees enjoy working at Idox. We continue to improve the experience of our employees with initiatives and additional benefits.

Recruitment

We have a centralised recruitment process where all hiring activity is managed and monitored by our internal Talent Acquisition Team. All candidates are able to discuss their own career goals directly with our Recruitment Officers, negotiating salaries directly, themselves, freely and without an intermediary. We never charge fees to candidates joining Idox and recruitment agencies are prohibited from charging work seekers by law under the Employment Agencies Act 1973.

All onboarding is done by our People Team and relevant right to work checks and security background checks carried out as normal practice before employment can be confirmed.

Commercial rate and background checks on Agencies are done by the Talent Acquisition Partner and we have a tightly controlled bench of providers. Any new supplier requests from Hiring Managers are reviewed by the People Team and the process supervised by Supply Chain Manage. No payments will be made to suppliers prior to relevant due diligence checks including Tax Status questionnaire.

Review & reporting

We continually focus on the improvement of our policies and processes to ensure that we are not directly or indirectly involved in any form of Modern Slavery. If any instances or risks of Modern Slavery are suspected or identified within the Idox business or within our supply chain, this information shall be reported to our Chief Legal Corporate Officer and Supply Chain Manager.

Signed by

David Meaden

A handwritten signature in black ink, appearing to read "D Meaden". The signature is fluid and cursive, with a large initial "D" and a trailing flourish.

Chief Executive & Director

Idox plc