

MODERN SLAVERY STATEMENT

Our businesses and supply chain Vesta Software 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, Information & address Management + payment processing.

This policy applies to Hopewiser which are now part of the Vesta Software Group.

The immediate parent company is Constellation Software UK Holdco Ltd and its ultimate controlling party is Constellation Software Inc.

The main supplier costs relate to Marketing, Professional, hosting and hardware costs, followed by maintenance 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 Vesta Software and Hopewiser.

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 online 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).

Vesta 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.

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 followup.

Key performance indicators (KPIs)

Vesta Software 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.