



## MODERN SLAVERY STATEMENT

PERIOD ENDING 30 JUNE 2024

### 1 INTRODUCTION

- 1.1 iManage LLC is formed in Delaware, United States, and iManage EMEA Limited is registered in the United Kingdom (together, **iManage, we, us, or our**). Both iManage LLC and iManage EMEA Limited carry on business in the United Kingdom and, as such, are required to prepare annual modern slavery statements under the United Kingdom's Modern Slavery Act 2015.
- 1.2 iManage LLC is also registered to carry on business in Australia as a foreign entity under Australian Registered Body Number 625 476 084 and is a reporting entity under the *Australian Modern Slavery Act 2018* (Cth).
- 1.3 This statement has been published pursuant to the United Kingdom's Modern Slavery Act 2015 and Australia's Modern Slavery Act 2018. It identifies the steps that we have taken to assess and address modern slavery risks arising in connection with our operations and supply chains, in relation to the period ending 30 June 2024.

### 2 BUSINESS AND SUPPLY CHAIN

#### **iManage's operations**

- 2.1 Headquartered in Chicago, iManage is a privately held cloud-based B2B software company. iManage helps leading organizations manage documents and emails more efficiently, protect vital information assets, and leverage knowledge to drive better business outcomes. iManage employs award-winning AI-enabled technology, an extensive partner ecosystem, and a customer-centric approach to provide support and guidance to more than one million professionals around the world.
- 2.2 iManage has development and support centres in the United States (**US**), the United Kingdom (**UK**), Canada, India, and Australia and serves customers in more than 65 countries. iManage sells products, solutions, and services to end-user business customers and service providers through a direct sales force and an ecosystem of channel partners.
- 2.3 iManage LLC is the primary operating entity of the iManage group of companies. iManage LLC also has five wholly owned subsidiaries incorporated in five different jurisdictions: iManage EMEA Limited (UK), NetRight Spain Holdings S.L. (Spain), iManage Canada Technologies ULC (Canada), NetRight Technologies Private Limited (India), and NetRight Singapore Holdings PTE Ltd (Singapore).

#### **iManage's supply chain**

- 2.4 iManage's supply chain provides goods and services to facilitate iManage's cloud-based B2B software business – supplying personnel, goods, and services to support the work product management solutions we provide to clients. We do not operate any manufacturing facilities.
- 2.5 Our Tier 1 suppliers are primarily based in the US, UK, and Australia, which are lower-risk jurisdictions, however, we recognise that these companies and/or their suppliers may manufacture goods and their components in countries that present higher risks of modern slavery. As explained in further detail below, over the last year, we have continued to develop our supplier evaluation processes with the goal of ensuring that all elements of our supply chain act in accordance with applicable laws, our values, and ethical business principles.

### 3 RISK OF MODERN SLAVERY

- 3.1 We are in the early to mid-stages of developing our modern slavery programme and are committed to identifying and mitigating against the risk of modern slavery in our operations and supply chain.

- 3.2 During the first half of 2024, we carried out a worldwide risk assessment of our employment and procurement functions to understand the levels of modern slavery risk as they relate to our operations and supply chains. The modern slavery risk assessment has considered the following risk variables:
- 3.2.1 Employment Practices Risks;
  - 3.2.2 Geographical Risks;
  - 3.2.3 Sectorial Risks; and
  - 3.2.4 Supply Chain Risks.
- 3.3 *Employment Practices:* iManage’s people operations systems and processes are well-established with the expected level of divisional oversight and engagement from key personnel. As an employer of predominantly professionally qualified and highly skilled people, the risk of modern slavery and human trafficking existing within our business is considered low.
- 3.4 *Geographical Risks:* iManage primarily operates in the US with secondary operations in Australia, Canada, and the UK, which are all considered relatively low-risk jurisdictions. While iManage operates in India and acknowledges there is heightened risk in this jurisdiction, given that we employ highly skilled professionals and have a robust people operations department, we consider the risk of modern slavery existing within our India-based business to be low as well. We acknowledge, however, that it is common for an organisation’s internal modern slavery risk profile to be different from that which is posed by its external supply chains. In this regard, we have undertaken a review of our expenditure over the last four years, with a particular focus on our top 15 suppliers, whose services account for over 50% of our total supplier spend (discussed further below).
- 3.5 *Sectorial Risks:* iManage provides technology services. We acknowledge that risks do arise because of related indirect activities such as sourcing of electronic equipment through our supply chain (discussed further below).
- 3.6 *Supply Chain Risks:* Over the last four years, we have assessed our supplier expenditure, including to which entities payments are made and in which countries such entities are based. As stated above, the majority of our Tier 1 suppliers are located in lower risk countries.
- 3.7 Our primary risk relates to our procurement of electronics, the manufacturing of which faces a heightened risk of modern slavery. To minimize such risk, we predominantly engage with blue chip companies beholden to comply with modern slavery laws and standards. We take some comfort in the level of sophistication of our higher spend suppliers.
- 3.8 The construction and maintenance of leased corporate offices and data centres that iManage uses to deliver services also face an elevated risk of modern slavery. However, the majority of our facilities are located in low-risk jurisdictions. We will continue to pay particular attention to any real estate we lease in higher risk countries such as India.
- 3.9 Overall, we consider our products and services to have a lower risk of the use of modern slavery based on the geography of our top suppliers, the sophistication of our top suppliers (being large conglomerates), the sector we operate in, and the level of control and oversight we maintain through our now-centralised procurement department.

#### **4 ACTION TAKEN BY IMANAGE TO COMBAT MODERN SLAVERY**

- 4.1 Tackling modern slavery and human trafficking is a complex challenge, and our efforts are ongoing to combat these practices. We are committed to reducing the risk of slavery, servitude, forced or compulsory labour, or human trafficking occurring in our supply chains or in any part of our businesses.

##### **Policies**

- 4.2 iManage has implemented several policies to mitigate against various relevant risks, including:

- 4.2.1 Employee Code of Conduct – iManage’s Employee Code of Conduct, which all employees attest compliance with on a yearly basis (at minimum), outlines our commitment to observing ethical standards that guide our business practices across a number of areas, including in relation to modern slavery and human trafficking. Employees are required to exercise care and due diligence before, during, and after supplier or partner selection to assess any modern slavery and human trafficking risks and maintain iManage’s commitment to ethical behaviour and working environments.
- 4.2.2 Third-Party Code of Conduct – Acceptance of iManage’s Third-Party Code of Conduct is required for all third parties, including suppliers and partners, and mandates that such companies be transparent and ethical and act in accordance with the standards expected of our own employees. Among other requirements, the code mandates that third parties must not engage in forced labour or discrimination.
- 4.2.3 Anti-Bribery and Corruption (**ABC**) Policy – We have an ABC Policy, also accepted by employees at least annually, to mitigate the risk of bribery and corruption (as well as the potential appearance of impropriety) occurring within our business activities. The ABC Policy provides guidance on recognising bribery and corruption, giving and receiving gifts and entertainment, and offering political and charitable donations, as well as the process for reporting potential violations and the potential consequences should a violation occur.

### **Internal Operations**

- 4.3 iManage has a dedicated people operations department, staffed with experienced personnel, which oversees our employment-based systems and processes regarding the recruitment, onboarding, and retention of employees in compliance with the different employment laws and standards required in the various different countries in which we operate.
- 4.4 Our workforce is primarily comprised of highly skilled roles that pay above minimum and/or living wage standards. The majority of our employees reside in the US, followed by the UK and India. We comply with all workplace health and safety standards applicable to the different countries in which we operate. Employees are not engaged in labour-intensive work and are otherwise afforded high quality office facilities.
- 4.5 iManage only utilises labour hire arrangements in limited and often temporary circumstances (for example, to facilitate flexible working when an existing employee seeks to move to a country in which we do not currently operate, thereby requiring engagement through a local third-party organisation). When such labour hire arrangements are used, we continue to have oversight over the working conditions of these individuals to ensure they are above-market.
- 4.6 iManage has implemented a career development framework to assist employees in progressing and developing in their roles. Benefit packages to support our employees and their families are offered globally. We pride ourselves on the individuality of our workforce. We host a range of Diversity, Equity & Inclusion events each year and have established several employee resource groups to promote opportunities for employees from diverse backgrounds, experiences, and identities to connect, share experiences, address challenges, and celebrate successes. iManage is committed to fostering an inclusive environment for all, with specific groups dedicated to female, Black, LGBTQ+, and neurodiverse employees, among others.

### **External Operations**

- 4.7 As stated previously, iManage’s Tier 1 suppliers are primarily based in the US, the UK, and Australia. Services and goods ranges from the provision of technology and electronics to non-core business activities such as office cleaning services and security services.
- 4.8 As part of our responsible supply chain efforts, we currently:
  - 4.8.1 require our suppliers to sign the Third-Party Code of Conduct during onboarding;
  - 4.8.2 insist, in our agreements, that our suppliers comply with local laws; and

4.8.3 have systems in place to encourage the reporting of concerns.

4.9 iManage has recently established a centralised procurement department and is set to launch, in the first half of 2025, a Global Procurement Policy to incorporate specific requirements relating to the vendor evaluation process, including mandatory guidance on all procurement activities globally.

### **Risk Assessment**

4.10 As described above, we engaged an external third party to conduct a modern slavery risk assessment on our global procurement and people operations functions. This process allowed us to understand the areas of our operations and supply chains that are most exposed to modern slavery risk and, correspondingly, where we must focus our attention to reduce these risks. Following on from this risk assessment, over the next 24 months, we will identify and implement measures to address and reduce any known risks of modern slavery occurring in our operations and supply chains.

## **5 EFFECTIVENESS IN COMBATTING MODERN SLAVERY**

5.1 Senior leadership is driving the implementation of our modern slavery programme. We are a business that is continuously evolving and improving. Recognising that we are at the early to mid-stages of implementing our modern slavery programme, our practices and procedures will be adapted over time, with their effectiveness periodically reviewed and modified as needed.

5.2 The recommendations contained in the assessment will inform our future initiatives, which may include implementing further policies, increasing resourcing to the procurement department, effecting various supplier due diligence processes, enforcing contractual terms and conditions, carrying out training, improving governance, encouraging a culture of compliance, and monitoring systems to measure the effectiveness of our actions.

## **6 CONSULTATION**

6.1 In developing our modern slavery statement, we consulted and engaged with key business areas, including those responsible for procurement, people operations, and legal services across iManage and our subsidiary companies.

6.2 iManage LLC does not own or control any other entities within Australia.

## **7 CERTIFICATION**

7.1 This statement is made pursuant to the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018. It constitutes iManage LLC's and iManage EMEA Limited's joint modern slavery and human trafficking statement for the period ending 30 June 2024.

7.2 This statement was approved by the principal governing body of iManage LLC.

Signature:



[Ray Scheppach \(Jun 30, 2024 09:47 CDT\)](#)

Ray Scheppach, being the Chief Financial Officer and Assistant Secretary of iManage LLC and a responsible member for the purposes of the Australian *Modern Slavery Act 2018* (Cth).

Date: 30 June 2024