



Lumesse Modern Slavery Act Statement

2019



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Our Statement

One of our fundamental principles is our commitment to run our organization responsibly. We maintain high ethical standards within our organization and in the provision of services to our customers.

Our Business and Supply Chain

The Saba Software - Lumesse corporate family delivers talent development solutions to customers around the world. We have a team of more than 1,400 people in our global offices, including Saba Software (UK) Limited and Lumesse Limited in the UK. Our talent development solutions have been deployed to more than 4,000 organizations, enabling them to engage and nurture the best talent in an ever-changing and demanding global environment.

Our Position On Modern Slavery

We do not use, or accept, forced, bonded, and involuntary or child labour. We only work with people who choose to work for us. We strive to develop our staff continuously and welcome people to speak up about any unethical behaviour. Our business practices and values reflect this.

We routinely review our policies, to ensure that they are in line with industry best practices and our business values and ethics. Key policies are communicated to employees during the onboarding process, and refresher training and/or re-certification is delivered as appropriate.

Our Governance and Standards

Saba's corporate policies are prepared and reviewed by our executives and the business teams that have responsibility for each aspect of our business interactions. Our policies underpin our core Saba values, including acting with integrity. Our leadership monitors adherence to our policies, standards, and values. Policy violations are promptly investigated, and will result in appropriate corrective action as defined in our policies and procedures.

We review the risk profile of our suppliers in order to focus our efforts. Some suppliers present a higher risk of slavery because of their location and/or type of service they provide.

We previously have analysed our direct suppliers to identify the areas with the highest risk of modern slavery and human trafficking. We found the highest risk in the provision of 3 services:

- Catering services in our offices;
- Cleaning services in our offices;
- Development services.

We require our direct suppliers in these high risk categories to certify in writing to their awareness of and compliance with the provisions of the Modern Slavery Act.

Continuous Improvement

Policy awareness and compliance is monitored as follows:



- HR teams monitor the completion of mandatory policy reviews and training, as part of our onboarding process;
- Our internal compliance function and other departments deliver refresher training and/or re-certification as to key policies, as appropriate;
- Our executives and business teams assess key risks in their respective areas of responsibility.

The output from policy compliance and review is used to update our policies.

Approved by the Board of Directors and signed off on its behalf


Lumesse Limited