

# UK Anti-Slavery & Human Trafficking Statement 2019

## Introduction

This statement sets out Bottomline Technologies' steps taken to understand all potential modern slavery risks related to our business and to put in place steps which are aimed at ensuring that there is no slavery or human trafficking in our own business as well as our supply chains. This statement will relate to actions and activities during 31 March 2019 to 30 March 2020.

## Organisational Structure & Supply Chains

Bottomline Technologies (NASDAQ: EPAY) powers mission critical business transactions. We help our customers optimise financially oriented operations and build deeper customer and partner relationships by providing a trusted and easy to use set of cloud-based digital banking, fraud prevention, payment, financial document, insurance, and healthcare solutions.

We innovate and deliver game-changing technology designed to delight customers and help them grow their business. Based on our deep market knowledge combined with development and business expertise, we constantly set, anticipate, and respond to changing industry and organisational demands.

Today over 10,000 organisations depend on Bottomline solutions to help power their success, including 60 of the Fortune 100 and 89 of the FTSE (Financial Times Stock Exchange) 100. Our corporate vision is to help our customers innovate, win and grow by powering their mission critical business transactions.

### *Countries of operation and supply*

Bottomline Technologies is headquartered in Portsmouth, New Hampshire and we have offices across the United States, Europe, and Asia-Pacific.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery & Human Trafficking statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our organisation or supply chains.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers as reflected in our Whistleblower Policy.

We have a zero tolerance to slavery and human trafficking and we expect all those in our supply chain and contractors to comply with our values.

## Our Guiding Principles

Bottomline Technologies guiding principles provide us with the framework to ensure we are committed to conducting business ethically and legally.

## Relevant Policies

Bottomline Technologies operates the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Anti-Slavery and Human Trafficking Policy:** The Company has designed this to assist in its compliance with the Modern Slavery Act 2015. The policy gives workers, contractors and other business partner's guidance on slavery and human trafficking and the measures taken by the Company to tackle slavery and human trafficking in its business and its supply chains.
- **Whistleblower Policy:** The Company encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's Whistleblower Policy is designed to provide all employees with the ability to report any violations of the Company's Code of Business Conduct and Ethics without fear of retaliation. Additionally, the Whistleblower Policy has been specifically designed to ensure that any employee who wishes to raise a concern on an anonymous basis can do so.
- **Employee Code of Conduct:** The Company's Code of Business Conduct and Ethics is the compass by which directors, officers, employees and contractors of Bottomline are expected to conduct themselves at all times. All Company business is to be conducted with the highest standards of integrity and in compliance with all applicable laws and regulations. This Code applies to the Company and all of its subsidiaries worldwide.
- **Recruitment/Agency T&Cs:** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All new agencies are required to sign the agreement to conform to the standards of the Company.

## Due diligence

The Company continues to conduct appropriate due diligence when considering taking on new suppliers and the review of its existing suppliers. Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour as reflected in our Code of Business Conduct & Ethics.

## Performance indicators

We recognise there is real value in an open and transparent dialogue with our key suppliers, and that no single business can tackle the problem alone. We require all staff to conduct the training below and the Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015.

## Training

The organisation requires all staff within the Company to complete the online training on slavery and trafficking.

The online training covers:

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;

## Awareness-raising programme

As well access to the online training, the Company has raised awareness of modern slavery issues by putting up posters across the organisation's premises and circulating a series of emails to staff.

These explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues
- what external help is available, for example through the Modern Slavery Helpline/The Salvation Army.

## Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking Statement.

This statement has been approved by a registered director, who will review and update it annually.

Director signature:



Director name:

PAUL DHANWAR

Date:

26 MARCH 2019