

UK MODERN SLAVERY ACT 2015 STATEMENT (FISCAL YEAR 2019)

INTRODUCTION

The United Kingdom Modern Slavery Act 2015 (“**MSA**”) requires large businesses to produce a statement each year setting out the steps they have taken to ensure that their business and supply chains are slavery free.

This statement is made pursuant to s. 54 of the MSA and sets out the steps JDA has taken (and will continue to take) in this regard in respect of the financial year 1st January 2019 - 31st December 2019.

OUR BUSINESS

We are a proven leader in artificial intelligence and machine learning (AI/ML) - driven supply chain and retail solutions for the world’s leading retail, manufacturing and logistics companies. We are a part of the JDA Software Group (“**Group**”), and our parent company is JDA Software Group, Inc. which has its head office in Scottsdale, Arizona, USA. The Group has over 4,600 employees worldwide and operates in 40+ locations within North America, South America, EMEA and APAC.

The Group has a global annual turnover of USD1bn.

For the avoidance of doubt, any reference to “JDA” in this statement is a reference to each and every company within the Group, as we observe the values set out in this statement regardless of geographical location.

OUR CORE VALUES

Our core values unite us. They make us unique and set us apart from our competitors. Our core values are what bind us together as one JDA. They are what we wake up in the morning believing in, and what carry us through our days. They are what drive our success – and the success of our customers.

- **Results** are the ultimate measure of our ability to deliver the value our customers expect and deserve. Our obsession with customer value is paramount to our success.
- **Relentless** describes our approach to new learning and innovation. Our relentless innovation, the lifeblood of any software company, drives our delivery of new solutions to market. Our relentless quest for learning opens doors for opportunity and advancement.
- **Teamwork** is critical to our success. We will move the company forward with respectful candor and collaboration. This is how great companies behave and is what forms trusting, productive teams and drives growth.

At JDA our associates uphold these Core Values as well as complying with all applicable laws (including the MSA).

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

JDA has implemented an Ethics and Compliance program that promotes the highest standard of ethical and legal conduct. Standards of business and ethical conduct have been implemented which apply to all JDA associates (including contingent workers and contractors) and also to third party legal entities (including their personnel) sub-contracted to work for or with JDA or that provide goods or services to JDA.

Our [Code of Conduct](#) and related policies provide a framework to guide our ethics and business practices. JDA will not tolerate or condone human trafficking or slavery in any part of our global organization. This policy is consistent with JDA’s Code of Conduct and our core values to protect and advance human dignity and human rights in our global business practices.

Our [Third Party Code of Conduct](#) explains the minimum standards of integrity and business conduct JDA expects of the Third Parties with which it does business, including, without limitation an expectation that Third Parties fully comply with requirements of applicable slavery, forced labor and human trafficking laws (including the MSA). We use these expectations as a foundation in how we approach JDA’s sourcing decisions, how we evaluate partner performance, and how we grow our business. We believe that partnerships based on transparency, collaboration and mutual respect are essential for our shared success. Third Parties working for JDA and are receiving the Third Party Code of Conduct agree to:

- adhere to the requirements and expectations set out in the Third Party Code of Conduct:
- provide complete and accurate information to facilitate third party due diligence efforts undertaken by JDA; and
- comply with local and international applicable laws and regulations in the country where they operate. To the extent any applicable law or regulation is more restrictive than this Third Party Code of Conduct, such law or regulation shall govern.

JDA employees, contractors, subcontractors, vendors, suppliers, partners and others through whom JDA conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery. While JDA does not “manufacture” in the traditional sense with the use of factories, JDA evaluates its supply chain to identify which Third Party suppliers pose the greatest risk in terms of complying with relevant laws. JDA also requires that all of its suppliers and partners comply with local law including, but not limited to, employment laws, anti-corruption laws and any other laws that regulate how people work. JDA may also carry out appropriate due diligence and risk assessments on suppliers to ensure their compliance with laws.

OUR POLICIES ON WHISTLEBLOWING AND NON-RETAILIATION AND NON-RETRIBUTION

JDA believes that positive associate relations and morale can be best achieved and maintained in a working environment that promotes ongoing open communication between executives, managers and all associates. Open and candid discussions of problems and concerns by associates are encouraged. JDA understands that associates may not report concerns if they feel that they will be subject to retaliation, retribution or harassment for reporting such concerns. We therefore have both a [Whistleblowing Policy](#) and a [Non-Retaliation and Non-Retribution Policy](#) to reassure associates who wish to report concerns, either through the JDA Ethics Line, or directly to the Legal or Human Resource Departments or to their manager.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training and certification in respect of our Code of Conduct to all JDA Associates annually. We also expect Third Party suppliers to communicate the principles of the Third Party Code of Conduct to their employees and partners.

This statement applies to JDA Software, Group Inc. and all of its affiliates (a list of which is available [here](#)). This statement was approved by the Board of Directors on the date signed below.

Signed on behalf of each company within the JDA Group, by:

Signature: *Daniel J Maynard*
Daniel J Maynard (Apr 15, 2019)

Name: Daniel J. Maynard

Title: President and Treasurer

Date: Apr 15, 2019

