

MODERN SLAVERY ACT 2015 ELLUCIAN'S SLAVERY AND HUMAN TRAFFICKING STATEMENT

At Ellucian, we take all possible steps to combat and prevent slavery and human trafficking.

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our business activities.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with the Modern Slavery Act 2015.

Our Business

Ellucian is a provider of software solutions and services to higher educational institutions. Ellucian's headquarters is located in Reston, Virginia, USA.

The Ellucian companies have approximately 3,000 employees worldwide and operates in 50 countries. We have offices in the US, UK, Mexico, Brazil, Colombia, Chile, Ireland, the Netherlands, India, UAE, and Australia.

Ellucian's Values

Ellucian's values unite us and guide us to our true north: helping higher education institutions achieve student success. They are:

- Amaze and Attract
- Enable Customer Greatness
- Dare
- Own Our Destiny
- Act with Courage
- Build Mindful Momentum
- Grow Together

We require everyone that works for Ellucian to respect these values, which ensure that we respect all individuals and that we comply with all laws (including the Modern Slavery Act).

Our Policies on Slavery and Human Trafficking

We are committed to acting with integrity in all of our business dealings and complying with laws. Many of our existing policies are aimed at ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our relevant policies include:

- **Employee Code of Conduct:** Ellucian's Code of Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier Code of Conduct:** Ellucian is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to a full review and may result in the termination of the business relationship
- **Recruitment/Agency workers** Ellucian uses only specified, reputable employment agencies to source labor and always verifies the practices of any new agency it is using before accepting workers from that agency.

Training

As noted above, Ellucian maintains a global Code of Conduct. In creating the Code, Ellucian considered many different standards relating to the ethical and humane treatment of people. All Ellucian employees are trained on the Code of Conduct upon hire and periodically provided refresher training thereafter.

Supplier Adherence to Our Values and Ethics

The software business sector is not considered most at risk and Ellucian does not have intricate supply chains, multiple levels of contracting and subcontracting or partnerships with businesses based in impoverished regions of the world where labor laws are non-existent or not enforced. Suppliers and business partners are subject to various forms of vetting, including the verification of information provided to Ellucian, and selective due diligence exercises will be performed, depending on the significance of the business partner to the continuity of Ellucian's business.

To ensure all those in our supply chain and contractors comply with our values, including our zero tolerance approach to slavery and human trafficking, we enter into appropriate partner agreements with all our suppliers and partners. As part of this, we expect all our suppliers and partners to comply with all applicable laws (including the Modern Slavery Act) and our Supplier Code of Conduct.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Ellucian's slavery and human trafficking statement for the financial year ending 31 December 2018.

Executive Team approval

This statement has been approved by Harshan Bhangdia, Senior Vice President, who will review and update it annually.

Signed:



Harshan Bhangdia, Sr. Vice President

Date:


