



FloQast, Inc. Modern Slavery Statement

FY 2024

Introduction

FloQast, Inc. (“**FloQast**”) is committed to conducting business ethically and responsibly, including taking steps to identify and eliminate any risks of modern slavery, forced labor, and human trafficking in our operations and supply chains. This Modern Slavery Statement (“**Statement**”) is designed to comply with FloQast’s reporting obligations pursuant to the [United Kingdom \(UK\) Modern Slavery Act 2015](#), the [Australia Modern Slavery Act 2018](#), and [Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act](#).¹ It outlines the steps taken by FloQast and its subsidiaries during the financial year ending on December 31, 2024 to identify, assess, and address modern slavery risks within our operations and supply chains.

Our Company

FloQast is a Delaware corporation headquartered in Los Angeles, California, with its principal place of business at 14721 Califa Street. FloQast is a software as a service (“**SaaS**”) company that offers a leading accounting platform comprising close management, reconciliation automation, accounting operation, and connected compliance solutions. FloQast’s platform is built by accountants for accountants. Our platform incorporates AI technology to enhance accounting workflows, improve accuracy, and increase visibility and collaboration.

We serve more than 3,000 global accounting teams across various industries, including technology, entertainment, healthcare, and financial services. Our customers range from high-growth startups to established enterprises.

FloQast is committed to upholding the highest ethical standards and to complying with all applicable laws and regulations. We are also committed to ensuring transparency in how we conduct our business in order to prevent modern slavery and forced labor in our supply chain.

Organizational Structure and Supply Chains

FloQast (the group parent company) is headquartered in the United States and has wholly-owned subsidiaries in countries throughout the world, including FloQast UK Ltd. in the United Kingdom,

¹ The UK subsidiary covered by this Statement is FloQast UK Ltd., registered in England and Wales with company number 10920805. The Australian subsidiary covered by this Statement is FloQast AU Pty. Ltd. ABN 98 662 658 862. The Canadian subsidiary covered by this Statement is FloQast Canada Ltd. with corporation number 1001064147.

FloQast AU Pty. Ltd. in Australia and FloQast Canada Ltd. in Canada. FloQast's subsidiaries provide sales, marketing and research and development services. FloQast's global procurement team is based in our headquarters in the United States. The majority of our contractors, partners, resellers, vendors and other suppliers are based in the United States, and most of our procurement is from U.S.-based contractors, partners, resellers, vendors and other suppliers. FloQast's global procurement team sources suppliers for all FloQast group entities.

As a SaaS company, we do not manufacture goods, operate factories or handle raw goods or commodities. Rather, our supply chains primarily consist of:

- Technology Infrastructure Providers: Cloud hosting services, data centers, and software development tools
- Professional Services: Consulting, legal, accounting, and other professional service providers
- Office and Administrative Suppliers: Office equipment, supplies, and facilities management
- Marketing and Sales Vendors: Marketing platforms, advertising agencies, and event management companies
- Human Resources Vendors: Recruitment, training, and employee benefits providers

Geographic Operations and Key Markets

FloQast's operations span across multiple countries, with our primary operations in the United States. We maintain primary offices in:

- Los Angeles, California (Headquarters)
- New York, New York
- Chicago, Illinois
- London, United Kingdom
- Sydney, Australia
- Pune, India

Our key markets include:

- North America (United States and Canada)
- EMEA
- APAC

Policies and Governance

Modern Slavery Policies and Commitments

FloQast is committed to conducting business ethically and responsibly, with respect for human rights and zero tolerance for modern slavery in any form. Our commitment is formalized through the following policies:

- **Code of Business Conduct and Ethics:** Our Code of Business Conduct and Ethics establishes the fundamental principles and standards that guide our business practices. It requires, among other things, that our directors, officers and employees must not (nor instruct others to) engage in any unlawful activity in conducting FloQast's business or in performing their day-to-day

company duties. This Code of Conduct has been in force during the last financial year and applies to all FloQast group companies and their personnel.

- **Supplier Code of Conduct:** Our [Supplier Code of Conduct](#) explicitly prohibits the use of forced labor, child labor, and human trafficking. It outlines our expectations for suppliers regarding ethical labor practices, including fair wages, reasonable working hours, and safe working conditions. To ensure that members of our supply chain comply with our values, including our zero tolerance for slavery and human trafficking issues in our supply chain, whenever possible we enter into agreements with our contractors, partners, vendors and other suppliers. As part of this process, we expect all such third parties to comply with our Supplier Code as well as all applicable laws and regulations, and depending on the nature of the transaction, the agreement specifically includes the Supplier Code of Conduct.
- **Vendor Management Policy:** Our Vendor Management Policy outlines our due diligence process when selecting vendors, our post-due diligence review process, our vendor risk-assessment process and the ongoing vendor management process. This policy allows FloQast to identify and address risks and maintain effective grievance and remediation processes.
- **FloQast Procurement Guide:** Our Procurement Guide outlines the procurement processes and procedures that all employees must adhere to, including the new supplier selection process and the legal review and approval process.

We regularly review and work to improve our policies by monitoring evolving international human rights standards and industry best practices, as well as adhering to industry best practices. Additionally, our Employee Handbooks include information for our employees on our ethical standards, vendor and supplier selection guidelines and our Whistleblower Protection Policy, which are reviewed annually.

Governance Structures and Accountability

FloQast has established clear governance structures to ensure accountability for addressing modern slavery risks:

Board Oversight: The Board of Directors has ultimate oversight of our modern slavery risk management approach. The Board reviews and approves our Modern Slavery Statement annually and receives updates on modern slavery risk assessment and mitigation activities.

Executive Leadership: Our General Counsel is responsible for the implementation of our modern slavery policies and procedures, with support from the following departments:

- Legal and Compliance: Oversees policy development, risk assessment, and compliance monitoring
- Procurement: Manages supplier due diligence and engagement
- Human Resources: Coordinates training and awareness programs
- Business Operations: Implements risk mitigation measures in our operations

Training and Awareness Programs

FloQast has implemented comprehensive training and awareness programs to ensure that employees understand modern slavery risks and their role in addressing them:

Employee Onboarding: All new employees receive training on our Code of Business Conduct and Ethics, including our commitment to human rights and ethical labor practices, as part of their onboarding process.

Specialized Training: Employees in roles with higher exposure to modern slavery risks, such as procurement, legal, and operations, receive specialized training on:

- Identifying indicators of modern slavery
- Conducting supplier due diligence
- Responding to identified risks
- Reporting concerns through appropriate channels

Ongoing Awareness: We maintain ongoing awareness through:

- Refresher training for all employees
- Updates on policy changes and emerging risks
- Remaining current with best practices

Risk Assessment and Due Diligence

Risk Assessment Methodology

We conduct ongoing risk assessments of our operations and supply chains. Our due diligence process includes:

- Screening all new suppliers against modern slavery risk criteria
- Including anti-slavery clauses in our supplier contracts
- Conducting enhanced due diligence, including questionnaires and documentation review, for suppliers identified as higher risk

Vendors and suppliers which are identified as potentially higher-risk are subject to heightened scrutiny.

Supply Chain Mapping and Due Diligence Processes

FloQast has implemented robust due diligence processes to identify and address modern slavery risks in our supply chains. Our supplier due diligence process includes:

- Pre-engagement screening: Assessment of potential suppliers against specified criteria, including modern slavery risk criteria
- Contractual requirements: Inclusion of modern slavery provisions in supplier contracts
- Self-assessment questionnaires: Collection of information on suppliers' policies, practices, and controls
- Documentation review: Verification of compliance through policy review and certification
- Ongoing monitoring: Regular review of supplier performance and compliance

Because of the sector in which we operate, the nature of our supply chains, and the values, policies and the Code of Business Conduct and Ethics which our employees, directors and officers are required to adhere to, we believe that our modern slavery risk is low. Additionally, FloQast does not have intricate supply chains, multiple contractor or subcontractor levels, or vendor relationships with large manufacturing businesses where modern slavery has been found to be an issue.

However, to the extent that a potential incident involving or relating to modern slavery or human trafficking were to arise within FloQast's business or supply chain, we would investigate and deal with that incident in accordance with our Code of Business Conduct and Ethics and other applicable policies.

Remediation and Corrective Actions

Should an issue be identified, we follow a victim-centered remediation process focused on the safety and well-being of affected individuals. We work collaboratively with suppliers to develop and implement corrective action plans to address root causes. Additionally, we maintain confidential reporting channels, including an Open-Door Policy and Whistleblower Protection Policy for all employees, and an internal reporting hotline for all suppliers, protected by a strict non-retaliation policy. All reports are promptly investigated and addressed.

In FY 2024, there were no instances of modern slavery, child labor or loss of income that came to our attention in our business or our supply chain.

Assessing Effectiveness

We assess the effectiveness of our program through a combination of key performance indicators, regular monitoring of our supply chain, targeted supplier audits, and an annual review process to identify areas for improvement. This ensures our approach remains effective and responsive to evolving risks.

Consultation and Conclusion

FloQast remains committed to continuously improving our approach to identifying and addressing modern slavery risks in our operations and supply chains.

We recognize that addressing modern slavery requires ongoing vigilance, collaboration, and adaptation. We will continue to enhance our policies, processes, and practices to strengthen our contribution to eliminating modern slavery in all its forms.

This Statement was prepared in consultation with internal teams, all controlled entities and key stakeholders.