

# ThoughtRiver Anti-slavery and Human Trafficking Statement

Financial Year ending 31<sup>st</sup> December 2026

## Introduction:

ThoughtRiver upholds a zero-tolerance approach regarding modern slavery and human trafficking. We are fully committed to ensuring that such practices do not occur anywhere within our business operations or supply chain. All members of staff, at every level of the business, share a collective responsibility to uphold this commitment. This includes remaining vigilant, identifying potential risks, and taking proactive measures to prevent any form of exploitation. Any concerns, suspicions, or observations related to modern slavery or human trafficking must be promptly reported to senior management, who will take appropriate action in line with our ethical and legal obligations. Through these efforts, ThoughtRiver aims to foster a safe, ethical, and transparent working environment for all.

## Our business and supply chains:

ThoughtRiver provides a highly accurate AI contract review tool deployed to some of the world's leading corporations and law firms. We work via email, Word or web and integrate into any workflow for pre-signature or post-signature contract review.

We maintain a relatively small supply chain, relying on providers for services in areas such as insurance, finance, HR, legal, recruitment, software, IT equipment, office space, and credit services.

Due to the nature of our business, we consider the risk of modern slavery within our operations and supply chains to be low.

## Our commitment to preventing slavery and human trafficking:

- **Supplier Engagement:** Before engaging any new supplier, we ensure they have an appropriate anti-modern slavery policy and/or contractual terms that demonstrate compliance with the Modern Slavery Act 2015.
- **Recruitment and Workforce:** We work with reputable recruitment agencies and ensure that all staff are authorised to work in the UK through thorough pre-employment checks, including DBS verification. We are committed to ensuring that all staff are treated fairly and protected from any form of abuse, coercion, or exploitation.

- **Ethical Conduct and Reporting:** At ThoughtRiver, we are dedicated to conducting business with honesty and integrity, and we expect all staff to uphold the highest standards of conduct. Staff are encouraged to report any suspected wrongdoing, including any activity related to modern slavery or human trafficking, to management. Staff are assured that they will not face any detrimental treatment for raising genuine concerns, in accordance with the law. We aim to foster a culture of openness and transparency, supporting staff in reporting concerns even if they later prove to be mistaken.
- **Internal Policies:** We maintain internal policies to ensure our business is conducted ethically and transparently, including:
  - Anti-Harassment and Discrimination
  - Equality, Diversity, and Inclusion
  - Grievance Procedures

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2026.