



STATEMENT

Modern Slavery & Human Trafficking Statement

Assivo's voluntary statement on the steps it takes to address the risk of modern slavery and human trafficking in its business and supply chain.

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Article I. Introduction and Status

Section 1.01 Purpose

This statement is published by Assivo, Inc. ("Assivo") to describe the steps it takes to address the risk of modern slavery and human trafficking in its own business and in its supply chain.

Section 1.02 Voluntary Publication

This statement is published voluntarily, with reference to the reporting structure of the UK Modern Slavery Act 2015 (section 54), the Australian Modern Slavery Act 2018, and the California Transparency in Supply Chains Act of 2010. Publication is not an admission that any of those laws applies to Assivo, and this statement is not made under any of them unless and to the extent a law requires it.

Section 1.03 Status of This Statement

This statement describes Assivo's approach as of its date. It is not a contract, a warranty, a certification, or a guarantee that no risk of modern slavery exists in Assivo's business or supply chain, and it creates no right in any Person and no duty of care. Assivo may revise or withdraw this statement at any time. The version published at the address shown on the cover of this document is the authoritative version, and any other copy is superseded by it.

Section 1.04 Definitions

"**Modern slavery**" is used here to mean slavery, servitude, forced or compulsory labor, debt bondage, and human trafficking, as those terms are generally understood in the laws referred to above. "**Person**" means any individual or entity.

Article II. Organization, Structure, and Supply Chain

Section 2.01 Business

Assivo, Inc. is a privately held business services company founded in 2017 and headquartered in Chicago, Illinois. Together with its subsidiaries, affiliates, and delivery entities (the "Assivo Group"), it currently has delivery operations in Mexico City, Mumbai, and Chennai, and may deliver services remotely, internationally, and through subcontractors in such locations as it determines. References to Assivo in this statement include the Assivo Group. Assivo provides managed operations and business process services to clients, principally in North America. Its personnel perform office-based knowledge work.

Section 2.02 Supply Chain

Assivo's supply chain consists mainly of providers of technology and software, office facilities and related services, professional services, recruiting services, and travel. Assivo does not manufacture goods and does not source raw materials.

Article III. Risk Assessment

Assivo considers the risk of modern slavery in its direct operations to be low, having regard to the nature of the work, the skill level of its personnel, and the fact that it recruits and employs its personnel directly or through agencies it selects. Within its supply chain, Assivo considers the areas of comparatively higher risk to be facilities services (such as cleaning and security) and third-party recruiting, and it directs its attention to those areas in proportion to the risk it perceives. This assessment reflects Assivo's judgment and is not the product of any external audit.

Article IV. Policies

Section 4.01 Code of Business Ethics

Assivo's Code of Business Ethics states that Assivo does not use forced or trafficked labor and expects its personnel to comply with applicable employment and labor law.

Section 4.02 Supplier Code of Conduct

Assivo's Supplier Code of Conduct states Assivo's expectation that its suppliers employ workers voluntarily, do not use forced, bonded, or trafficked labor, do not retain identity documents or charge recruitment fees, and apply comparable expectations to their own supply chains.

Section 4.03 Recruitment

Assivo does not charge candidates fees in connection with employment and does not retain the identity documents of its personnel.

Article V. Due Diligence

Assivo takes steps that it considers reasonable and proportionate to understand the suppliers with which it does business, which may include reviewing a supplier before engagement, including compliance and labor expectations in supplier terms where appropriate, and seeking information from a supplier where a concern arises. The nature and extent of review depend on the supplier's category and Assivo's perception of risk. Assivo does not represent that it audits its suppliers or that its diligence would detect every instance of non-compliance.

Article VI. Effectiveness

Assivo has not adopted quantitative indicators for the effectiveness of these steps and does not consider that the nature of its business warrants them at present. Assivo assesses effectiveness qualitatively by reference to whether concerns are raised and how they are addressed, and reviews its approach periodically.

Article VII. Training and Awareness

Assivo expects personnel responsible for hiring and for engaging suppliers to be aware of the indicators of modern slavery and of the reporting channel in Article VIII.

Article VIII. Reporting

Any Person may report a concern about modern slavery connected to Assivo's business to ethics@assivo.com. Assivo does not permit retaliation against any Person who reports in good faith. Assivo may investigate reports as it considers appropriate and has no obligation to report the outcome to the reporter.

Article IX. Review

Assivo reviews this statement periodically and intends to update it as its business, supply chain, and understanding of the risk change. Assivo does not undertake to publish on any particular schedule.

Outside Counsel

Legal inquiries concerning this Modern Slavery & Human Trafficking Statement may be directed to Assivo's outside counsel. This does not replace any notice address specified in this document.

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Contacting counsel through this document does not create an attorney-client relationship between Neal, Gerber & Eisenberg LLP and the person making contact. Counsel represents Assivo, Inc. only. Routine inquiries may also be sent to hello@assivo.com.

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