

Modern Slavery Policy

Introduction

The statement sets down the Company's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small.

The Company Modern Slavery policy encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

Staff are expected to report their concerns and management to act upon them.

Signs and indicators

There may be signs of physical or psychological abuse, victims may look malnourished or unkempt, or appear withdrawn. Victims may rarely be allowed to travel on their own, seem under the control, influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work. They may be living in dirty, cramped or overcrowded accommodation, and / or living and working at the same address.

Victims may have no identification documents, have few personal possessions and always wear the same clothes day in day out. What clothes they do wear may not be suitable for their work. People may have little opportunity to move freely and may have had their travel documents retained, e.g. passports. They may be dropped off / collected for work on a regular basis either very early or late at night. Victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.

Organisational structure and supply chains

This statement covers the business activities of iplicit Ltd.

The Company currently operates in the following countries: England

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 Whistleblowing policy - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 The Company's CSR policy summarises how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process include building long-standing relationships with suppliers and making clear our expectations of business partners AND/OR evaluating the modern slavery and human trafficking risks of each new supplier AND/OR invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship].

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all relevant staff to be aware of our modern slavery policy.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The COO endorses this policy statement and is fully committed to its implementation.