



# Modern Slavery Act Statement

Haiilo  
April 2025

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## Introduction

Hailo is committed to promoting and enforcing ethical practices throughout our operations and supply chains. We recognize the importance of combating modern slavery and human trafficking and are dedicated to ensuring that our business and supply chains are free from such practices. We want to highlight why our company is free from modern slavery and how we are committed to prevent such practices from taking place in our company as well as in our supply chain.

## Structure, business and supply chains

Hailo is a software development company for internal and external employee communication, operating globally. We are committed to conducting our business responsibly, with integrity, and in compliance with all applicable laws and regulations. Our business is located in London, Manchester, Hamburg, Helsinki and Atlanta. We ensure a safe working environment in all of our locations and treat all of our employees with respect and dignity.

## Our Policies in relation to human trafficking and slavery

We have implemented a comprehensive set of policies to address the risks of modern slavery and human trafficking within our organisation. These policies include:

[Business Partner Code of Conduct](#): We require all our business partners to adhere to our Business partner Code of Conduct, which explicitly prohibits the use of forced labour, child labour, and any form of modern slavery.

[Employee Code of Conduct](#): Our employees are required to adhere to our Employee Code of Conduct, which emphasises the prohibition of any form of slavery, servitude, or forced labour. In our Employee Code of Conduct we highlight our company values, which include integrity. We state clearly what our company stands for and that we do not tolerate modern slavery in any kind of form.

## Identification of risks

As Haiilo is operating globally we understand the risk of modern slavery. Our employees are all working in low risk areas for forced labour according to the [Global Slavery Index](#). We want to note that the software industry generally poses a lower risk for modern slavery. We recognize that suppliers operating outside of our primary business scope, who provide support and services to both our UK operations and other entities within the Haiilo globally, may carry a higher potential risk within our extended supply chain.

## Due diligence processes

As part of our commitment to ethical business practices, we conduct due diligence on our key suppliers to evaluate and mitigate the risk of modern slavery within our supply chains. This comprehensive approach involves regular audits, assessments, and close collaboration with our key suppliers to ensure adherence to our Business Partner Code of Conduct.

## Risk assessment and management

Haiilo is committed to continuous improvement in our efforts to combat modern slavery. We encourage the reporting of any concerns related to modern slavery and ensure that appropriate action is taken.

Haiilo does not engage in complex supply chains, utilise multiple layers of contracting or subcontracting, or collaborate with businesses located in regions where labour and employment laws are either minimal or inadequately enforced.

## Training on modern slavery and human trafficking

All UK personnel have received training on the stipulations of the Act, as well as our responsibilities and compliance strategies. We will persist in providing regular updates and tailored training sessions for our procurement team as we refine our initiatives.

After assessing the efficacy of the measures we've implemented to comprehend and mitigate the risk of slavery or human trafficking in our supply chains, we are committed to advancing our efforts to combat these issues.

## Review and Updates

This statement is reviewed annually and updated as necessary to reflect changes in our business operations, policies, and applicable legislation.

## Approval

28.04.2025, Manchester

On behalf of Haiilo,



Andrew Avanesian (CEO)

## References

[Business Partner Code of Conduct](#)

Internal Reporting:

[Haiilo Internal Reporting Policy](#)

UK government:

<https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement>

Global Slavery Index:

<https://www.walkfree.org/global-slavery-index/>

## Imprint

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