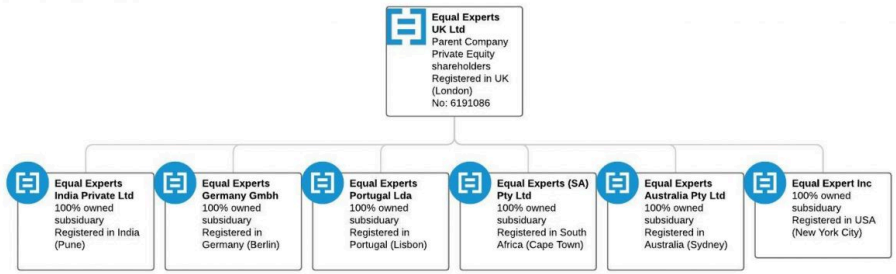


We are committed to preventing slavery and human trafficking in our corporate activities and to ensuring that our supply chains are free from slavery and human trafficking.

We are members of Sedex and use their expertise to review our supply chains and to provide confidence to our clients.

Organisational structure and supply chains

Equal Experts UK Ltd is a management consultancy business engaged in all aspects of software engineering. The company is privately owned, limited by shareholding and operates in 7 countries with the following organisational structure.



In relation to Modern Slavery we consider our primary activities to be:

- Professional consultancy on defining, building and operating software systems
- Software engineering teams
- Product and Software Engineering services

We consider our activities to be low risk because our staff and suppliers are highly skilled, very experienced and knowledgeable.

We consider the countries we operate in to be low risk, with the exception of:

- Policies are the responsibility of our COO and are reviewed annually.
- Risk assessments are the responsibility of our Business Unit Leads within each country.
- Investigations and due diligence for those investigations is the responsibility of our COO with the appropriate Business Unit Lead and our Global Operations team.

Awareness is raised with all employees through annual training and induction. Further awareness training is provided to all individuals involved directly in the above areas of responsibility. This policy is cascaded to our suppliers through their service agreements and our onboarding activities.

Relevant policies

The following policies are appropriate for the Modern Slavery Act.

Employee Team Charter

Our Team Charter forms part of our Employee Handbook and explains the behaviours we expected of them including our expectations regarding the key tenets of the Act while at work.

Whistleblowing Policy

We encourage all our employees to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature. The Modern Slavery Act 2015 (the "Act") is specifically referenced within our employee handbook.

Code of Conduct for Suppliers

We are committed to ensuring our suppliers adhere to our team Charter that is incorporated into our framework agreements. This includes demonstrating safe working conditions where necessary, treating workers with dignity and respect, and acting within the law in their use of labour. Serious violations will lead to the termination of our business relationship. We use specified, reputable employment and recruitment agencies to source labour and verify the practices of any new agency invited to act for us. We cascade this Policy to our Tier 1 supply chain and introduce its



Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review existing suppliers. This due diligence includes:

- evaluating the modern slavery risks of each new supplier as part of our onboarding process
- conducting supplier audits through Sedex where general risks are identified (see risks below)
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through Sedex and requiring them to implement action plans

KPIs

We monitor the following KPIs and report to relevant bodies when required:

- % of employees completing annual MS training
- % of Tier 1 supply chain companies completing MS awareness as part of onboarding or induction session

Risk notes

We currently have a higher level of monitoring in the following areas:

Countries

- South Africa; small company governance and legal compliance in the economy is lower than our standard.
- India; staff and labour supply may have hidden slavery or bonded labour practices.

Practices



It has been approved by Equal Experts UK Ltd Board of Directors, who last reviewed it on 23rd February 2024.

Sam McGregor, Chief Operating Officer

Simple solutions to big business problems.