

Modern Slavery Statement for financial year 2022

Date: 31 May 2023

Version: 1.0

1 Introduction

This modern slavery statement for Adaptavist Holdings Ltd (“Adaptavist”) and its subsidiary and affiliated companies (listed below) is made in accordance with section 54 of the Modern Slavery Act 2015, for the financial year period from 1 October 2021 to 30 September 2022.

We set out below the steps we have taken to ensure that there is no modern slavery in our businesses and in supply chains and we confirm that we understand, acknowledge, and act in accordance with section 54 of the Modern Slavery Act.

Adaptavist does not tolerate any forms of slavery, which consist of but are not limited to human trafficking, drug trafficking, sex trafficking, and unpaid labour. As a global company, Adaptavist sets out to provide internal awareness towards the goal of adherence to legislation regarding modern slavery, and to act promptly and accordingly toward any potential breach internally and within its supply chains.

2 Company Overview, structure, and supply chains

Adaptavist is incorporated in the UK and with subsidiary companies (listed below) incorporated in the United States of America, Canada, Spain, The Netherlands, Estonia, Australia, Malaysia, Hong Kong, Greece, Cyprus, Germany, Ukraine, and South Africa having approximately 900 employees, with the majority working for our UK entities.

We are a global technology and innovative solutions provider, helping organisations boost agility and overcome the challenges of digital transformation.

Subsidiaries of Adaptavist Holdings Ltd for the period covered by this statement:

- Adaptavist Canada Limited (Canada)
- Adaptavist GmbH (Germany)
- Adaptavist Group Ltd (UK)
- Adaptavist Inc (USA)
- Adaptavist OU (Estonia)
- Adaptavist Pty Limited (Australia)
- Adaptavist Sendirian Berhad (Malaysia)
- Adaptavist UK Services (UK)
- Adaptavist Ventures Ltd (UK)
- Adaptavist.com Ltd (UK)
- Aligned Agility (USA)
- ARUK Global Ltd (UK)
- ASPV Apps Ltd (UK)
- AVSTC Limited
- Awnaba (Spain)
- Clever Consultants Ltd (UK)
- Go2Group Asia Limited (Hong Kong)
- Gravity Works Consulting PTY Ltd (South Africa)
- Kolekti Ltd (UK)
- Salable LTD (UK)
- Salenda Grupo Salenda, Sociedad Limitada Unipersonal (Spain)
- Go To Group LLC (USA)

2.1 Our Supply Chain:

We are a producer of software products and services, and provider of expert software solutions professional consultancy and support services. A high proportion of those products and services are delivered by Adaptavist’s own employees rather than external agencies or suppliers. Due to this process and the nature of our business, Adaptavist believes that we have a considerably lower risk of modern slavery occurring in our supply chains compared to companies in other sectors. Nevertheless, we are continuing to focus this current year on policies and procedures to ensure that slavery and human trafficking does not take place within our supply chains.

3 Approach

Adaptavist's addresses modern slavery requirements in its Company policies, and by taking a Risk based approach to assess supply chain risks for which we implement appropriate compliance controls and due diligence steps.

These are further described below:

3.1 Company policies

Adaptavist has a number of policies to further our commitment to combat modern slavery and human trafficking. These include:

- Code of Conduct and Ethics Policy, which provides guidance on the standards of behaviour which all of our staff must follow; and
- International Supplier Code of Conduct which outlines the minimum standard of behaviour we expect from our suppliers (including agents, contractors, distributors, joint venture partners and suppliers).

3.2 Supply chains

As described in the Company overview section, Adaptavist believes that there is low risk in its supply chains. Accordingly, the measures we take are:

- The majority of our third-party support is for IT, marketing, real estate, facilities and professional services; engagement with such suppliers is subject to having contracts in place and these undergo legal contract review in accordance with the company's internal governance guidelines.
- Adaptavist also conducts weekly reviews of new clients and suppliers being used by the company to review any outstanding issues, including sanctions and adverse media.

4 Plans for Financial Year 2023

Subject to further internal board-level approval, we are currently planning to augment existing policies and measures for this current year as follows:

1. Continue to re-review complete list of suppliers across the Adaptavist group and check contracts
 - o Send high risk category suppliers our Supplier Code of Conduct and questionnaire for completion
2. Internal awareness (training) programme