



2021 Modern Slavery Act Transparency Statement

Sterling Infosystems, Inc.

About this Statement

This statement is made pursuant to the UK Modern Slavery Act of 2015, and the Australian Modern Slavery Act of 2018, to disclose the steps taken by Sterling Infosystems, Inc. (“Sterling”) and its subsidiary companies worldwide to combat and prevent modern slavery in our operations and supply chain during the financial year concluding on December 31, 2020.

This joint statement covers all Sterling entities in the UK and Australia, including Sterling (EMEA) Ltd., and RISQ Group Holdings Pty Ltd. (ABN 19 127 622 646), which includes AIM Screening Pty Ltd. (ABN 88 099 537 470), and National Crime Check Pvt Ltd. (ABN 60 139 183 145) . Although not all Sterling entities are subject to the Modern Slavery Acts of the United Kingdom or Australia, the practices and commitments described herein are applied globally.

Organisation

Sterling, a leading provider of background and identity services, offers a foundation of trust and safety that spans across industries, professions, and borders. Our technology-powered services help organisations create great environments for their workers, partners, and customers. With office locations around the world, Sterling conducts more than 100 million searches annually, offering services such as criminal background checks, verifications, workforce monitoring, drug and health screening, and fingerprinting services to clients across various industries.

Sterling provides the foundation of trust and safety our clients need to create great environments for their most essential resource, their people. We believe everyone has the right to feel safe. Our values, policies, and people-centric culture are aligned with the goals of the Modern Slavery Act, and keep Sterling consistently equipped to recognize, address, and communicate potential cases of forced labour and human trafficking.

During the 2020 financial year, Sterling took steps to combat and prevent modern slavery in our operations and supply chain, by exercising due diligence obligations on new vendors and clients,



scheduling ongoing vetting of our existing vendors, and requiring employees to complete training on our Code of Conduct and relevant policies.

Commitment

As a leader in our industry, Sterling recognizes the necessity of our role in helping to combat and report modern slavery and human trafficking around the world. We recognize that eradicating these crises are a significant target of the UN's Sustainable Development goals, and that bona fide participation from the private sector is needed to achieve this. The principles contained within the Code of Conduct ensure that ethical, responsible, and humane behaviour are integral to the day-to-day business operations at Sterling. The business culture and philosophies constituted by the Code of Conduct, and its universal application to all Sterling team members—internally, and in relations with vendors, clients, and partners—compel an environment that is constructive to the prevention and reporting of potential instances of modern slavery.

Our Supply Chain

Sterling has three main areas of supply chain: data, technology, and operational expenses.

Data is the core information we obtain from suppliers and utilize to provide services to our customers. Examples include, but are not limited to public records, criminal records, identity verification, employment verification, driving records, health screening data, etc. Technology includes the hardware, software, hosting, telecommunication and resources associated with building, implementing, and operating our delivery platforms upon which our services are conducted and provided to customers. Operational expenses include all labour, goods, and services acquired to operate our business and the facilities and environments in which we work, including operational overhead.

Due Diligence

Sterling applies a risk-based approach to assessing our vendors' compliance with our applicable laws and regulations, anti-corruption and anti-bribery standards, global sanctions policies, privacy and data protection standards, and information security. Our Global Vendor Management Policy ensures that our vendors are properly vetted prior to engaging in business and on an ongoing basis to ensure continued compliance with our zero-tolerance position on forced labour and human trafficking. Vendors are subject to an extensive due diligence process that evaluates them in the following ways: ensures the legitimacy and structure of their organisation; identifies their locations, practices, operations, and relationships with other organisations; screens for legal and financial red flags, sanctions, litigation, regulatory violations, and ongoing investigations; and analyses their policies and compliance programs. Likewise, thorough steps are taken in Sterling's credentialing process for our clients to ensure they are legitimate, active, and registered legal entities that are subject to compliance with relevant laws and regulations. Clients must further attest to compliance with all applicable laws, Equal Opportunity Employment, Sterling's right to perform audits, and that our services will only be used for declared permissible purposes.



Values and Policies

Sterling’s core values include building trust and creating a safer world, coupled with our “It’s all about people” philosophy. Policies and programs such as Sterling’s Code of Conduct, Global Ethics Hotline & Investigations Policy, Global Vendor Management Policy, and Global Sanctions Policy—among others—compel an environment that is constructive to the prevention and reporting of potential instances of modern slavery, internally and with our partners and clients. Our values, policies, and people-centric culture are aligned with the philosophical goals of the Modern Slavery Act, and keep Sterling consistently equipped to recognize, address, and communicate potential cases of forced labour and human trafficking. Sterling’s Code of Conduct and Global Ethics Hotline & Investigations Policy oblige employees to report violations of company policies and applicable laws, and provide appropriate channels and protections to enable honest and accurate information to be provided for thorough investigations and reporting to law enforcement or other government agencies. The coupling of internal reporting and accountability with diligence in vetting the parties in our supply chains empowers Sterling to have the necessary confidence that we can effectively identify and report cases or suspicions of modern slavery.

Training

All members of the Sterling team are held to high standards of quality and professionalism, and are trained to ensure they can verify the identities of persons and the legitimacy of entities with which Sterling engages. Additionally, through training and experience, Sterling employees remain well-equipped to identify fraudulent or stolen documents, noncompliance with relevant laws and regulations, and other red flags that may indicate forced labour or the unwillful transportation of people.

Assessment and Ongoing Commitment

We understand that Sterling is at lower risk for human rights violations in our operations and supply chains due to the nature of our services and procurement, which necessitate mostly skilled labour and minimal travel. Despite our confidence, our efforts to ensure that we are not enabling, contributing, or are otherwise linked to slavery or human trafficking are continually refined to continue minimizing our potential exposure, by controlling for evolving risks through strict adherence and routine updating of the aforementioned policies and due diligence practices.

As new trends and risks emerge, Sterling maintains our commitment to complying with the Modern Slavery Act, cooperating with the combatting of forced labour and human trafficking, and holding ourselves and our partners accountable in doing so.

This statement was approved by the Board of Sterling (EMEA) Ltd. and RISQ Group Holdings Pty Ltd. (on behalf of AIM Screening Pty Ltd. and National Crime Check Pvt Ltd.) on January 21, 2021.

Steven L. Barnett

Director, Sterling (EMEA) Ltd. and RISQ Group Holdings Pty Ltd.
