

# inGenious AI Modern Slavery Statement (2023-2024)

## Introduction

This modern slavery statement sets out the steps that inGenious AI Pty Ltd (ABN: 6361 7284 492) has taken to ensure that modern slavery and human trafficking do not take place in the inGenious AI business or supply chains during the financial year from 1 July 2023 to 30 June 2024. This statement is made in accordance with the Modern Slavery Act 2018 (Cth) (Australia).

## Our Business

Founded in 2017, inGenious AI provides and manages a content management system platform that allows for the creation, operation, and improvement of chatbots. These chatbots understand and simulate human conversation, enabling website users to interact with content in a way that mimics communicating with a person. inGenious AI is headquartered in Melbourne, Australia and employs a diverse team.

## Our Suppliers

Our major suppliers typically fall into one of the following categories:

- **Hosting services providers:** These providers host our data and our customers' data processed in our software as a service (SaaS) offerings.
- **Third-party consultants:** These include subcontractors that we engage for various services, such as accounting, legal counsel, IT applications, security, and professional services.
- **Service providers:** These provide a range of services, including travel, employee payroll, and maintenance.

Where possible, we use preferred suppliers for our service providers and consultants. We use a range of contracts with our vendors and carry out due diligence and seek to include appropriate contractual terms to prevent, as far as practicable, any practices of modern slavery.

## Risks of Modern Slavery Practices in Our Operations and Supply Chains

Despite our assessment that the modern slavery risk presented by our operations and supply chains is low, we are committed to identifying and addressing any potential risks. Our risk assessment includes:

- The type of services we engage in, such as SaaS and professional services.
- The nature of our largest vendors, typically consisting of hosting and related cloud service providers.
- The geographic locations in which we engage, ensuring that the majority of our suppliers are in jurisdictions with low risks of illegal activities like modern slavery.

## Actions Taken to Assess and Address Risks of Modern Slavery

### Governance

In line with our commitment to the highest standards of legal and ethical business conduct, we

support the elimination of modern slavery and human trafficking as outlined in the United Nations Universal Declaration of Human Rights. Our Code of Conduct prohibits any unlawful or unethical activity by any of our directors, officers, employees, or consultants. Furthermore, we expect our suppliers to acknowledge our Human Rights policy and to conduct their employment practices in full compliance with all applicable laws and regulations.

## **Policies**

inGenious AI operates several policies to identify and prevent slavery and human trafficking in our operations:

- Whistleblowing Policy: Encourages all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Code of Conduct: Clearly states the actions and behaviour expected of employees when representing the business.
- Vendor Management Policy: Makes explicit reference to slavery and human trafficking in supplier contracts.

## **Due Diligence**

We conduct due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services.
- Auditing suppliers' health and safety standards, labour relations, and employee contracts.
- Requiring improvements to substandard employment practices.
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

We require all suppliers to attest that:

- They do not use any form of forced, compulsory, or slave labour.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract containing a reasonable notice period for terminating employment.
- They do not require employees to post a deposit/bond or withhold their salaries for any reasons.
- They do not require employees to surrender their passports or work permits as a condition of employment.

## **Training and Awareness**

We have raised awareness of modern slavery issues by having staff training sessions and sending an email focused specifically on modern slavery to all our staff, explaining:

- Our commitment in the fight against modern slavery.
- Red flags for potential cases of slavery or human trafficking.
- How employees should report suspicions of modern slavery.

## **Assessing Effectiveness of Our Actions**

We have defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- The number of employees who have completed mandatory training.
- The number of suppliers who have rolled out an awareness programme equivalent to ours.
- The number of reports made by our employees indicating their awareness and sensitivity

to ethical issues.

- Findings from our cross-functional Human Rights team reviewing how we are addressing modern slavery and human trafficking.

## **Consultation**

This statement has been prepared by inGenious AI in consultation with the relevant functions within the company, including procurement, human resources, revenue operations, and legal and compliance functions. We do not own or control any other entities.

## **Approval**

This statement covers 1 July 2023 to 30 June 2024 and has been approved by the board of inGenious AI at the board meeting on 1st July 2024.

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Mark Chatterton

CEO, inGenious AI

Date: 1st July 2024