

Modern Slavery Statement

Introduction

Avetta, LLC, and its affiliates and subsidiaries (“Avetta,” “Group,” or “we”) are committed to constantly improving our practices to combat slavery. This statement highlights the key activities we have undertaken during the financial year ending on 31 December 2023 to combat modern slavery in our organisation and supply chain.

As a global business with offices located in all the main regions of the world, we recognize the issue of modern slavery and human trafficking as a global problem and that it can impact upon Avetta, our workers and clients alike. The Avetta executives and stakeholders demand that we uphold the highest levels of ethical business practice and transparency; we are committed to working with our internal stakeholders to (i) ensure that there is no modern slavery within our own business, and (ii) support our clients who participate in our supply chain risk mitigation programmes, irrelevant of their geographic location. The senior management team and all stakeholders take responsibility for developing and implementing the contents of this policy statement. They make sure adequate resources are allocated to ensure that slavery or human trafficking is not taking place within our supply chain. This statement confirms the actions taken by Avetta, as a group, to understand where the risk of modern slavery may be found in our day-to-day business and to implement controls to ensure there is no slavery or human trafficking present.

This statement is prepared in accordance with the requirements of both the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth).

Reporting entity

The reporting entity for this statement is:

Avetta, LLC
3300 North Triumph Blvd. Suite 800
Lehi UT 84043

Other entities of the Group currently do not meet the reporting requirements.

Organisation's structure

Avetta, LLC is the parent company of the Group. The Group operates from a series of strategically located offices in the main regions of the world with over 700 employees.

Other entities of the Group include the following:

<u>Entity Name</u>	<u>Location</u>
Avetta Do Brasil Tecnologia da Informação Ltda	Brazil
Avetta India Pvt Ltd.	India

Avetta Limited	United Kingdom
Avetta Pty Ltd.	Australia
Avetta Germany GmbH	Germany
Industry Skills Limited	New Zealand
Pegasus Management Pty Ltd.	Australia
Pegasus Safety & Training Pty Ltd.	Australia

Our business and supply chains

As a business with a global footprint, we support companies that operate in all regions of the world in both developed and emerging economies. Avetta provides its supply chain risk services to clients to evaluate and analyse their supply chains in over 120 countries. We offer a configurable SaaS-based solution that assists organisations – both large and small – in managing supply chain risk across a variety of disciplines. Our supply chain risk management network (“**Network**”) connects organisations across industries, including telecom, construction materials, manufacturing, mining, facilities management, high tech, and energy with a qualified and vetted workforce among suppliers and contractors. We work in partnership with client organisations providing them with value-add procurement, sustainability and health and safety risk-based data on their suppliers and detailed analysis of these outputs focusing on ethical business practices.

To learn more about the nature of our business, go to <https://www.avetta.com/>.

As a company, we have a relatively simple supply chain that includes the purchase of products and services needed for the day-to-day operations, including office supplies, employment and training of staff, external legal advice, leasing of office space, IT infrastructure and support services and travel. However, each of our vendors has their own supply chain, and as such some elements of our supply chain can be relatively complex.

Our policies on slavery and initiatives

We have developed appropriate policies that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Code of Business Conduct and Ethics covers a wide range of business practices and procedures. It sets out guiding principles on professional conduct and establishes that in performing job duties our employees, officers, and directors must always act with integrity and conduct themselves and the company’s business in the most ethical manner possible.

Our Code of Conduct for Vendors and Service Providers outlines Avetta's expectations of vendors and other third-party resources performing services to Avetta.

We have also updated our Procurement Policy to strengthen our commitment to ethical and responsible sourcing. This update clarifies employee responsibilities and outlines our risk-based approach for vendor due diligence, incorporating insights from the 'Global Estimates of Modern Slavery: Forced Labour and Forced Marriage,' a report jointly developed by the International Labour Organization, Walk Free, and the International Organization for Migration.

In 2019 we became a signatory to the United Nations Global Compact, integrating the ten business principles into our corporate culture and our product offering, further strengthening our commitment to the provision of an ethical and fair work environment not only for all our global operations but those of the third parties utilised by our clients.

We are a member of the United Kingdom Gangmaster Labour Abuse Authority Construction Protocol, which has been created to actively prevent modern slavery within the UK construction supply chain. We are an active supporter of this government agency, and we promote this tremendous initiative wherever we can to help address this dreadful practice.

We have used the United Nations Global Principles to define our in-house ethical and sustainability approach, which has been implemented throughout our global operations.

Due diligence processes for slavery

Internally, we have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistleblowers

We prioritise the management of modern slavery risks by implementing a robust due diligence and risk mitigation programme that focuses on areas with a higher likelihood of modern slavery, considering factors such as geographic location, industry sector, and vendor profile.

Additionally, as a provider of supply chain risk management solutions, we empower our clients to manage their own supply chains. Our clients utilise our services to understand and evaluate their supply chain. As part of this service, we assess their suppliers' level of compliance to the legislation regarding good business practice in their country of operation, collecting and analysing real time data throughout all levels of their supply chain and their capacity and capability as an organisation. This includes implementing programmes to prevent slavery and human trafficking within the extended supply chain. We serve about 500 clients ranging from small, specialist businesses to large, multinational companies with tens of thousands of employees. As a business, we recognise we have a responsibility to give something back and generate a positive impact within the business sectors where we operate. To assist our clients in the evaluation of suppliers we use the services of qualified auditors to undertake audits. Suppliers who may import a high

degree of risk into a client organisation are subject to detailed analysis of their management programmes, including safety of the workforce, reduction of environmental impacts, ethical sourcing, and assurance that no forced labour or slavery is present within that business; this also includes detailed analysis of a supplier's capability where there may be a reliance on subcontracting which can increase the probability of issues being identified.

Avetta enters a collaboration with clients that utilise our services because we share the same values and understand the importance of always conducting business in an ethical and transparent manner. All Avetta personnel involved in supplier evaluation have received training to recognize the signs and potential traits that constitute modern slavery and human trafficking.

We have also developed a three-stage sustainability audit programme that incorporates analysis of different labour practice not restricted to slavery and trafficking but also including the serious issues of child labour, workplace safety, and prevention of corruption within the supply chain. Additionally, we have developed and integrated a programme for our global clients that covers environmental, social and governance (ESG) mandates addressing due diligence issues centred around human rights, business transparency, and climate change. This programme can be applied to a wide range of clients and considers supplier demographics and their place within the supply chain.

Third-party adherence to our values and ethics

Our Code of Conduct for Vendors and Service Providers covers our expectations specific to any organisation or individual that we enter into a contractual relationship (new and existing vendors) with, confirming that we will only deal with vendors who can clearly demonstrate a commitment to human rights and good labour practices, health and safety, and a reduction in their environmental impacts.

The third-party auditors we work with also receive training on our business practice before commencing work on our behalf.

Additionally, the suppliers in our Network (our customers) are contractually required to comply with all applicable anti-slavery and human trafficking laws, statues, regulations and codes from time to time in force.

Recruitment practice

We have introduced a range of company policies and recruitment practices that are endorsed at the highest level within the company. This ensures that from the time an individual commences their working life with Avetta, they fully understand the business and respect equal opportunity, diversity, freedom of opportunity, and the removal of discrimination within the working environment. We operate a robust recruitment practice, including conducting eligibility to work checks in line with government regulations, including the United Kingdom government requirements. This applies to all employees to help prevent human trafficking or individuals being forced to work against their will. At times, we use the services of external recruitment agencies,

who are also required to confirm their compliance with the legislation in place within the country of operation and our codes of practice.

We do not charge a fee to join Avetta as an employee, and we do not expect any external agencies to do so. We recognise that slavery and human trafficking has a major impact upon an individual's freedom and anything that deviates from this goes against our core values. All individuals who work for Avetta have chosen to do so of their own free will.

Training and communication

We are committed to conducting all business transactions in an ethical and transparent manner. We recognise that in some areas of the world, there can be cultural differences where unethical business practice can occur or be deemed acceptable. We will not deviate from our business ethos, and to reiterate this, all members of our global workforce are provided with training and guidance on the content of all our business policies and how we should conduct ourselves in all our business relationships.

We have implemented company procedures that reinforce how issues such as modern slavery and human trafficking should be addressed. All personnel are advised they have open access to any member of the executive team to report concerns they may have regarding our business conduct. All personnel who are in a position where they can procure products or services on our behalf are expected to fully understand our Code of Conduct for Vendors and Service Providers so that they do not willingly procure goods or services that may be impacted by modern slavery or human trafficking.

Our annual training programme requires that all members of our staff must acknowledge a wide range of business specific training materials and they are evaluated based upon their understanding of these material, and ultimately, they are required to confirm their participation and agreement to adhere to the content. Our members of the global workforce who could encounter modern slavery and human trafficking issues are also provided with interactive training on how to identify the issues that are specific to modern slavery and human trafficking.

Remuneration for work

All personnel employed by Avetta are paid more than the living wage. Where we utilise the services of third parties such as an external auditor, they are also paid more than the living wage.

Our effectiveness in combating slavery

We are engaged in an ongoing assessment of both the nature and extent of our exposure to the risk of modern slavery and the effectiveness of our efforts to manage this exposure. We continually review areas of our supply chain that may be at higher risk.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The number and type of issues identified on screening suppliers and sub-contractors
- The number of reported breaches in the past year
- The number or percentage of staff trained
- The instances of remedial action being needed

We manage the risks to our organisation by maintaining high standards of due diligence and risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate in, prioritising areas with a higher likelihood of such issues.

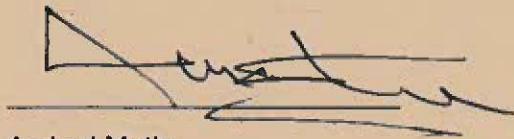
Confirmation of intent

The senior management team within Avetta are committed to ensuring that there is no modern slavery or human trafficking within our global business or our supply chain. We extend this commitment to our clients by applying our range of supply chain evaluation services as applied to their supply chain. We wish to demonstrate this by adopting our Modern Slavery Statement and continually striving to improve our offerings to increase our due diligence and governance both in house and to our clients. We are focused upon improving our sustainability credentials, and we have appointed key personnel to drive our global strategy throughout our business and entrench this into our daily business activity.

Consultation processes

We have acted in consultation with the entities within the Group in preparing this statement. Each of the entities have reviewed this statement.

This statement was approved by the principal governing body of the parent company, Avetta, LLC, on 28 May 2024, and endorsed by Arshad Matin, Chief Executive Officer.



Arshad Matin

Chief Executive Officer