

Slavery and human trafficking statement

For the year ended December 31, 2022

Our commitment

Xplor Technologies, LLC and its affiliated group companies (collectively “Xplor” or “we”) have a zero-tolerance approach to all forms of slavery and human trafficking. At Xplor, we always want to do the right thing. So, we try to make sure that no-one working at Xplor, or in our supply chains, is being exploited; that these people are safe; and that we follow all relevant employment, health and safety, and human rights laws and standards wherever we do business.

About Xplor

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We are a global provider of vertical-specific Software-as-a-Service (SaaS), embedded payments and highly differentiated Commerce Accelerating Technologies. Headquartered in Atlanta, Georgia, USA, we employ approximately 2,300 people in Europe, the United Kingdom, Asia-Pacific and North America. Xplor was created in 2021 through the combination of two pre-existing businesses.

Xplor provides enterprise-grade solutions for businesses in “everyday life” verticals: Childcare & Education, Fitness & Wellbeing, Field Services (maintenance, HVAC, lawncare, pest control and cleaning) and Personal Services (laundry and dry-cleaning).

Our technology products and services are developed in-house, or sourced from professional suppliers in Europe, the United Kingdom, Asia Pacific and North America. Our highly skilled workforce are primarily permanent employees. As a result, we believe we face minimal risk of experiencing slavery and human trafficking issues in our supply chains.

Xplor is managed on a vertical-by-vertical basis. This means that Xplor’s management teams have visibility across Xplor’s individual vertical teams and products; and across its affiliated group companies. This slavery and human trafficking statement has been prepared in consultation with stakeholders that have management responsibility for all relevant Xplor verticals and for all our group companies.

Our policies and controls

We maintain a system of policies and controls designed to run our business properly and ensure that slavery and human trafficking has no place at Xplor or in our supply chains.

All Xplorers must adhere to our policies, which reflect the commitment of both our senior management team and our company to act ethically and transparently. Our whistleblowing policy is a key tool for encouraging Xplorers to report any unethical behaviour or practices; and they are empowered to do so without fear of repercussion.

In keeping with Xplor’s evolution, our policies and controls continue to evolve. One of our current areas of focus is to further strengthen our supplier due diligence and risk management processes, which are discussed in the following paragraphs of this statement. We are guided by our ethical culture and determination to see human rights upheld.

Supplier due diligence

Xplor's opposition to slavery and human trafficking is absolute. We will not knowingly support or do business with any organisation involved in either of these activities. As soon as it is reasonably practicable to do so, we will stop working with any supplier that does not meet the standards we expect.

We continue to strengthen our assessment requirements; and we undertook a significant amount of work during the statement period to prepare for the launch of a new groupwide Procurement Policy with a view to standardising our approach. Any new supplier relationship requires approval from our Legal & Governance and Procurement teams before we start working with them. We continue to seek contractual commitments from prospective new suppliers that they will observe all laws and regulations in the jurisdictions in which they, and we, do business.

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As our organisation evolves we will regularly review our assessment processes; and improve these where necessary.

Risk management

During this statement period we have continued to improve our processes for finding and contracting with new suppliers. We have continued to involve Xplor's Legal & Governance team and other relevant stakeholder teams at an early stage of engagement.

During this statement period we updated our group policies and processes, with one area of focus being the improvement of governance standards and key controls. Our company-wide training program is established and includes regular training related to understanding slavery and human trafficking, for all Xplorers. We continue to review the controls we use; and we're committed to carefully managing any slavery and human trafficking risks.

Our effectiveness in combating slavery and human trafficking

We consider the risk of slavery or human trafficking in our business and supply chain to be low; and we are determined to make sure these practices play no part in the products and services we offer. We will strive to develop a set of indicators so that we can track performance in this area.

Training


We have a robust and recurring training program for all Xplorers. This training includes specific topics to ensure that all Xplorers understand our expectation that they act legally and ethically when performing their duties. We understand that specific slavery and human trafficking training is necessary to equip Xplorers to identify slavery and human trafficking risks. These training materials are always available to Xplorers.

Conclusion

This slavery and human trafficking statement applies to the entire Xplor group. This means it applies to Harlands Services Limited and Debit Finance Collections plc for the purposes of the Modern Slavery Act 2015 in the United Kingdom. It also applies to AI Sky Aus Holdco Pty Ltd, Debitsuccess Pty Ltd, Links Modular Solutions Pty Ltd, Zenrol

Pty Ltd, Paysmart Pty Ltd, QK Technologies Pty Ltd and MyXplor Pty Ltd for the purposes of the Modern Slavery Act 2018 (Cth) in Australia.

This statement was approved by the board of directors of Xplor on May 18, 2023 and will be reviewed annually.

A rectangular box containing a handwritten signature in black ink. The signature is cursive and appears to read "Pamela Joseph".