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Modern Slavery Statement

Introduction from the CEO

This statement sets out Applaud's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Applaud Solutions recognises that it has a responsibility under the Modern Slavery Act 2015 to take a robust approach to slavery and human trafficking and we are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Covid-19 has caused unprecedented disruption and change on a global scale. The impact of the pandemic has been greatly felt by suppliers, and the hundreds of thousands of workers within our extensive supply chains, and we have had to adapt to the challenges it has presented.

Our commitment to our customers and stakeholders is very clear; we will always treat people in our business and supply chain fairly. This means we will continually review and improve our policies, practices, and procedures so that we can fulfil this commitment.

Organisation's structure

We are a global provider of consumer grade HR technology for businesses worldwide. Our software and digital solutions are used by more than one million professionals. Headquartered in London, we have teams based around the UK. We also have operations and offices in India. Our supply chains are predominantly based within the USA, UK, and India.

Due to the nature of our services, our business operations are predominantly in the software development and technical arena, in addition to professional services including project management, customer support, service delivery and implementation.

We provide services to a range of private and public sector organisations, such as local and national government, retail, aerospace, oil and gas and professional services.

Our supply chains

Our supply chains are relatively simple, and the nature of the goods and services procured provides only limited opportunities for modern slavery and/or human trafficking practices.

We do not act as a producer, manufacturer or retailer of physical goods and we have no supply chain in relation to such activities.

Our supply chains include:

- Office services, equipment, furniture or consumable supplies
- Data storage
- Infrastructure & hosting
- Email validation
- Marketing and promotional literature and/or merchandise
- IT and electronics equipment and/or service

Our policies on slavery and human trafficking

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We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all 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.

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **HR & Culture Policies** - We communicate our Modern Slavery Policy within our Staff Handbook which is available to all colleagues and is provided upon commencement of employment. We have zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally, and are paid above the national minimum wage. Our employees won't be forced to work in excess of the number of hours permitted in law, and normal working hours won't exceed 48 hours per week average unless the employee agrees.
- **Recruitment Policy** - The organisation uses only specified, reputable employment agencies to source agency workers and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Whistleblowing Policy** - We encourage all of our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Applaud. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.
- **Partnering Agreements** - The organisation is committed to conducting partnering activities in a fair, objective and transparent manner that satisfies the requirements of accountability and internal controls including but not limited to Applaud's 'Ethical Code of practice', 'Anti-Bribery' and 'Modern slavery and Human Trafficking' policies which fulfil legal and financial obligations and effectively manages commercial risk. Emphasis is placed on selecting partners, suppliers and service providers that demonstrate recognisable environmental, sustainable, business integrity along with Corporate Social Responsible (CSR) standards including but not limited to compliance with laws and regulations, respect for human rights, labour working conditions, equal opportunities, health and safety accreditation, maintenance and promotion of information security, fair trade and acceptable corporate ethics.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we regularly take steps to:

- *Identify and assess potential risk areas in our supply chains.*
- *Mitigate the risk of slavery and human trafficking occurring in our supply chains.*
- *Monitor potential risk areas in our supply chains.*
- *Protect whistle blowers.*

Supplier & Partner adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain, partners and contractors comply with our values and ethics we have a dedicated compliance team, which consists of representatives from the following departments:

- Legal
- Finance
- Product / Service

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- Human resources
- Sales
- Operations
- Marketing

Training & Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking, Applaud has raised awareness of modern slavery issues by circulating information to employees.

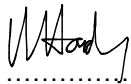
The information explained to relevant employees:

- The principles of the Modern Slavery Act 2015 and how it applies to Applaud;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

We are currently improving our colleague mandatory training and planning to strengthen knowledge through these activities.

Within the nature of the business, we have not identified any high-risk Modern Slavery concerns in 2021.

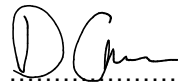
This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2021. It was approved by the board on


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Ivan Harding

Chief Executive Officer & Co-Founder

Date: 31st March 2022


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Duncan Casemore

Chief Technology Officer & Co- Founder

Date: 31st March 2022

Applaud Solutions