



MODERN SLAVERY ACT POLICY

Policy Statement

Appen (Europe) Limited and its subsidiaries (Group) acknowledges its responsibility within the Modern Slavery Act 2015 (UK) and has a zero tolerance approach to any form of modern slavery. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Appen is committed to acting ethically and with integrity and transparency and to driving out acts of modern day slavery and human trafficking within the business and supply chains, including sub-contractors.

Our Policy

We will ensure transparency within the Group and suppliers of goods and services to the Group through steps which include:

- Assessing and reducing the risk in the business of modern slavery practices occurring e.g. checking the authenticity of papers proving a right to work in the UK;
- The Group maintains a preferred supplier list. We will conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery;
- Providing information to staff on the warning signs that might indicate that modern slavery is taking place;
- Promoting to staff the importance of raising immediately any concerns they may have;
- Protecting staff who are 'whistle blowers' in respect of concerns they have about modern slavery.

In addition to the modern slavery policy, the Group operates a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Code of conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.



This policy was approved by the Board of Directors of Appen (Europe) Limited on 12 March 2018 and is issued on a version controlled basis.

A current version of this policy is available to all members of staff at P:COMPANY DOCUMENTS/Policies.

Signature for Master Copy only:

Chris Vonwiller
Chairman
Appen (Europe) Limited

Date: 12 March 2018

Version Control

Version Number	Purpose/Change	Author	Date
1.0	Initial release.	Morag Van Niekerk	20.10.17
1.1	Update	Morag Van Niekerk	12.03.18
