



## **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 in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure acts of modern day slavery and human trafficking are not taking place anywhere within our own business or in any of our supply chains, including sub-contractors.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.

### **Responsibility for the Policy**

The Audit and Risk Committee has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Financial Officer has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure that are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in the supply chains.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Chief Financial Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

### **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, and if staff are unsure about whether a particular act, treatment of workers or working conditions within any tier of our supply chains constitutes any



of the various forms of modern slavery, we encourage staff to raise their concerns with the Chief Financial Officer;

- Promoting to staff the importance of raising immediately any concerns they may have and encouraging openness and support of anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken;
- Protecting staff who are 'whistle blowers' in respect of concerns they have about modern slavery, and ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

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.

### **Communication and Awareness of this Policy**

Communication about this policy forms part of the induction process for individuals who work for us.

### **Breaches of This Policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### **Board Approval**

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.

Chris Vonwiller  
Chairman

Appen (Europe) Limited

Date: 12 March 2018



## *Version Control*

<b>Version Number</b>	<b>Purpose/Change</b>	<b>Author</b>	<b>Date</b>
<b>1.0</b>	Initial release.	Morag Van Niekerk	20.10.17
<b>1.1</b>	Update	Morag Van Niekerk	12.03.18
<b>1.2</b>	Update (OC review)	Kevin Levine/Sarah Lowe	12 April 18