

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that CENSUS Labs UK Limited has taken and continues to take in order to ensure that modern slavery or human trafficking does not take place within its business or supply chain.

CENSUS Labs UK Limited is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that its supply chain is also free of such practices.

Having its registered offices at Suite Lp32969 20-22 Wenlock Road, London, N1 7GU, United Kingdom with VAT Registration Number UK257827564, CENSUS Labs UK Limited is a provider of IT Consultancy and Cyber Security Services in the IT Security Services Sector.

CENSUS Labs UK is a member company of CENSUS Labs Group of companies. For more information you may visit: www.census-labs.com

CENSUS Labs UK and CENSUS Labs Group of companies shall be hereinafter referred jointly as "CENSUS", except noted otherwise.

CENSUS Business and Ethics

CENSUS Labs UK Limited is a leading Cyber Security company; private limited company registered in England and Wales (registered number 09701924). CENSUS has approximately 60 employees and provides IT and OT security services to public and private organisations around the world.

CENSUS always works to the highest ethical standards and complies with all laws, regulations, and rules relevant to its business. Reputation is of paramount importance, and CENSUS takes Corporate and Social Responsibilities very seriously. Relationships with clients, employees, shareholders, suppliers, or the local community, are key to success and, as such, the Company values its obligations and commitments to all stakeholders.

CENSUS applies several internal policies to ensure conducting business in an ethical and transparent manner. These include, but are not limited to:

- 1. Anti-slavery policy.** This policy sets out the organisation's stance on modern slavery and explicates how employees can identify any instances of this and how they can report it and seek help.

2. Recruitment policy. CENSUS operates 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.

3. Whistleblowing policy. CENSUS operates a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within its business or supply chain, without fear of reprisals.

4. Code of business conduct. This code explains the manner CENSUS behaves as an organisation and how it expects its employees and suppliers to act.

Policies relating to slavery and human trafficking

CENSUS statement reflects its commitment implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating its business operations or supply chain, and to act ethically and with integrity in all its business activities and relationships.

CENSUS ensures that its staff and associates are aware of the Company's policies and take appropriate measures to ensure that its associates adhere to the same high standards.

Staff training/induction

During induction, CENSUS ensures that staff fully understand the risks of modern slavery and human trafficking infiltrating its business and effectively employ its policies and procedures aimed at mitigating this risk.

CENSUS regularly conducts training for its procurement/buying teams so that they recognise the signs of modern slavery and know what to do if they suspect that it is taking place within the Company's supply chain.

CENSUS makes specific provision in its policy for any type of modern slavery.

Finally, CENSUS has raised awareness of modern slavery issues by circulating a series of emails to employees. The emails aim to explain to employees:

- the basic principles of the Modern Slavery Act 2015;
- the steps CENSUS has taken to comply with the Modern Slavery Act 2015, and where the statement is available;
- how they can report potential slavery or human trafficking issues to the relevant parties within CENSUS;
- how to search what external help is available, for example through the Whistleblower Hotline.

CENSUS People

A fundamental role of CENSUS business is to keep its clients safe from cyber threats; this also translates in the non-cyber world; for both its own colleagues and those working with CENSUS through its Supply Chain. CENSUS now has training available to its people which enables them to identify risk factors, understand the implications, and assist the Company in implementing the Anti-Slavery Policy.

All CENSUS people undergo identity and right-to-work checks as part of the recruitment process and prior to commencing employment. CENSUS employs most people directly or on a fixed term basis, with checks in place to ensure that the payment of salary is made directly to that person.

CENSUS Supply Chain

Although Slavery is illegal in every country of the modern world, it unfortunately still exists and is a brutal form of organised crime whereby people are forced to work against their will under the threat of some form of punishment. The vast majority of these people are in the supply chain of legitimate industries.

Building on the sound foundations already laid, the Procurement team are constantly reviewing and improving Supplier Due Diligence and onboarding processes. This is strengthened by the significant investment CENSUS has made in Company Systems and Process redesign.

CENSUS currently has offices in the following countries:

- Greece
- United Kingdom
- United States of America

CENSUS operates a supplier policy and maintains a Preferred Supplier list. The Company conducts due diligence on all suppliers before allowing them to join the list. This includes an online search to ensure that a particular organisation has never been convicted of offences related to modern slavery [and on-site audits which include a review of working conditions]. CENSUS anti-slavery policy forms part of its contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above and as part of CENSUS contract with suppliers, the Company requires that suppliers confirm that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold to account their own suppliers over modern slavery.
3. (For UK-based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.

5. CENSUS reserves the right to terminate the contract at any time, should any instances of modern slavery come to light.

CENSUS performance indicators

CENSUS verifies the effectiveness of the steps taken to ensure that slavery and/or human trafficking is not taking place within its business or supply chain, if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

CENSUS has a zero-tolerance approach to modern slavery, and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the Company's business or in any of its supply chain.

1.2 CENSUS is also committed to ensuring transparency in its own business and in its approach to tackling modern slavery throughout the Company's supply chain, consistent with its disclosure obligations under the Modern Slavery Act 2015. CENSUS expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, CENSUS includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that its suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for CENSUS or on its 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.

1.4 This policy does not form part of any employee's contract of employment and CENSUS reserves the right to amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

2.1 CENSUS Board of Directors has overall responsibility to ensure this policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it.

2.2 The HR department has primary and day-to-day 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 they are effective in countering modern slavery.

2.3 CENSUS Management at all levels is responsible for ensuring that the people reporting to them understand and comply with this policy and are given sufficient and regular training on both the policy and the issue of modern slavery in supply chain.

2.4 Individuals that knowingly breach of this policy will be subject to disciplinary action up to and including dismissal.

3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you read, understand, and comply with this policy.

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

3.3 Should you believe or suspect that a conflict with this policy has occurred or may occur in the future, you must as soon as possible notify your manager or Compliance.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of CENSUS business or supply chain of any supplier tier at the earliest possible stage.

3.5 Should you believe or suspect a breach of this policy has occurred or may occur, you must notify your manager or report it in accordance with CENSUS Policy as soon as possible.

3.6 If you are unsure about whether a particular act, the general treatment of workers, or working conditions within any tier of CENSUS supply chain constitute any of the various forms of modern slavery, raise it with your manager or the compliance officer.

3.7 CENSUS aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. CENSUS is committed to 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 its own business or in any of its supply chain. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should immediately inform the compliance manager. If you are an employee and the matter is not remedied, you should formally raise it using CENSUS Grievance Procedure.

4. BREACHES OF THIS POLICY

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

4.2 CENSUS reserve the right to terminate its relationship with its associates, other individuals and organisations working on its behalf, should they breach this policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps CENSUS has taken to ensure that its business as well as its supply chain are free of slavery and human trafficking during the financial year ending December 2022.

CENSUS Journey

CENSUS acknowledges that the fight against Modern Slavery is not static; therefore, to improve its mitigation in the following financial year, CENSUS will focus on further developing;

- Staff Awareness on Modern Slavery through improving training and communications,
- Mapping the higher-risk parts of its supply chain to gain further visibility down the tiers,
- Reviewing its standard form of contracts to include additional protection such as warranties, right of audit, and indemnities.

Approved by the Board of Directors of CENSUS Labs UK Limited on 1 January 2022 and signed by:

Nikolaos Tsagkarakis

Patroklos Argyroudis

Director

Director