

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 is continuing to take to ensure that modern slavery or human trafficking is not taking place within our 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 our supply chains are also free from such practices.

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

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

Our 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 around 60 employees and provides IT and OT security services to public and private organizations around the world.

We always work to the highest ethical standards and comply with all laws, regulations and rules relevant to our business. Our reputation is paramount and we take our Corporate and Social Responsibilities very seriously. We realise that our relationships with those we deal with, whether clients, employees, shareholders, suppliers or the local community, are key to our success and as such we take our obligations and commitments to those people very seriously.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

2. 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.

3. 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.

4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Policies relating to slavery and human trafficking

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

We ensure that our staff and associates are aware of our policies and take appropriate measures to ensure that our associates adhere to the same high standards.

Staff training/induction

During induction we ensure that staff fully understand the risks of modern slavery and human trafficking infiltrating our business and effectively operate our policies and procedures aimed at mitigating this risk.

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

We make specific provision in our 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 explain to employees:

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

Our People

A fundamental role of our business is to keep our customers safe from Cyber threat; this also translates in the non-Cyber world; for both our own people and those working

with us through our Supply Chains. We now have training available to our people which enables them to identify risk factors, understand the implications and assist us in implementing the Anti-Slavery Policy.

All our 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.

Our Supply Chain

Although Slavery is illegal in every country in 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 chains of legitimate industries.

Building on the sound foundations already laid; the Procurement team are reviewing and improving Supplier due diligence and on boarding. This is only strengthened by the significant investment we have 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. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our 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, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account 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. We may terminate the contract at any time should any instances of modern slavery come to light

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our 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 have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 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.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

2.1 The board of directors has overall responsibility for ensuring 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 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 supply chains.

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 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.

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

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

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

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the compliance officer.

3.7 We aim 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. We are 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 our own business or in any of our supply chains. 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 inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our 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 We may terminate our relationship with our associates, other individuals and organisations working on our behalf if they breach this policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending December 2021.

Our Journey

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

- Staff Awareness on Modern Slavery through improving training and communications
- Mapping the higher risk parts of our supply chain to gain further visibility down the tiers
- Reviewing our 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 March 2021 and signed by:

Nikolaos Tsagkarakis

Director

Patroklos Argyroudis

Director