MODERN SLAVERY STATEMENT

This statement sets out AMTIVO Group’s actions to understand potential modern slavery risks related to its business and to put in place processes that aim to ensure there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2021 to 31 December 2021.

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. 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.

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.

2. Organisational structure

AMTIVO Group was founded in 2017 with the financial backing of August Equity, a private equity group with head operations in London. They are excited to work with professionals of vision and ambition and are proud to have appointed a management team with a successful track record in compliance, finance and technology.

The Group has developed a strong portfolio of brands that are complementary and contribute to the strength of the Group's product and service offerings.

Countries of operation

<table>
<thead>
<tr>
<th>UK</th>
<th>Ireland</th>
<th>Italy</th>
<th>Japan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Singapore</td>
<td>Malaysia</td>
<td>Pakistan</td>
<td>Taiwan</td>
</tr>
<tr>
<td>Mexico</td>
<td>Thailand</td>
<td>Romania</td>
<td>Lebanon</td>
</tr>
<tr>
<td>Bangladesh</td>
<td>Norway</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. Assign responsibilities and training

The Senior Management Team has overall responsibility for ensuring this statement complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this statement and are given adequate and regular training on it and the issue of modern slavery in supply chains.
Training on this statement, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

4. Detail policies & procedures

**Anti-Slavery and Human Trafficking Policy**

AMTIVO Group 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. Our Anti-Slavery and Human Trafficking Policy applies to all stakeholders in any capacity, including employees at all levels.

**Code of Ethics**

AMTIVO Group helps to build high performing, sustainable organisations that deliver for their customers, employees, investors and the societies in which they operate. Our ethos is to provide a professional, healthy and comfortable working environment where employees feel empowered. Cohesive working is fundamental to the continued success of AMTIVO Group and to support this we have developed our Values which all employees should demonstrate in their daily interactions with both internal and external stakeholders.

**Equality, Inclusion and Diversity Policy (covering Recruitment and Selection)**

We will actively support diversity and inclusion and ensure that all our employees are valued and treated with dignity and respect. We want to encourage everyone in our business to reach their potential.

The aim of the policy is to ensure no job applicant, employee or worker is discriminated against either directly or indirectly on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

**Sustainable Environmental and Ethical Procurement Policy**

The purpose of this policy is to outline AMTIVO Group’s approach to minimising the environmental impact of its activities.

Our Procurement Policy sets out the detailed requirements and minimum expectations of our policy of sustainable and ethical procurement. The Policy addresses minimum expectations of our organisation’s staff and our suppliers.

**Whistleblowing Policy**

We encourage employees to use our Whistleblowing procedure if they are concerned about any wrong doing at work. Employees are protected from suffering any detriment or termination of employment if they make disclosures about the organisation.

All employees have access to Safecall, an independent company that operates a confidential reporting service. The service is available to receive reports including: Health and Safety, Corruption, Harassment, Dishonesty, Fraud, Victimisation, Bribery or any other issue that is unacceptable in the workplace.