

4-Xtra Technologies Limited Modern Slavery and Human Trafficking Statement May 2023

Introduction

This Modern Slavery and Human Trafficking Statement is made pursuant to section 54 of the Modern Slavery Act 2015 (“MSA”) and relates to actions and activities during the financial year 2023/2024 as well as the steps intended to be taken by the Company over the next financial year.

The statement sets out the commitment made by 4-Xtra Technologies Limited to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.

We all have a duty to be alert to risks, however small. Employees are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of 4-Xtra Technologies Limited which are as follows:

The development and licencing of a SaaS based, machine learning, risk management platform. The platform is intended to be licenced to relevant parties within the financial industry, across the globe.

The Company operates in low-risk industries and geographic locations; its supply chain primarily consists of legal and tax advisors, consultants and IT service suppliers.

The Company’s anti-slavery initiatives

The Company operates a number of internal policies to ensure that it is conducting business in an ethical and transparent manner, including a Harassment & Bullying Policy and Whistleblowing Policy.

The Company is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in its supply chains.

The Company expects the same high standards from all its contractors, suppliers and other business partners. The Company expects that its suppliers will hold their own suppliers to the same high standards. It is important to the Company that we only engage suppliers who comply with all applicable laws including, but not limited to, those relating to human and labour rights (including forced labour, child labour and applicable employment, environmental, anti-corruption, fair competition and intellectual property laws). We detail our Risk Assessment and Due Diligence in this regard below.

The Company seeks to promote a working environment where workers are treated with respect, dignity and consideration.

The Company complies fully with applicable human rights legislation in the countries in which it operates, which includes upholding freedom of association and the right to collective bargaining, equal remuneration and protection against discrimination.

Risk Assessment and Due Diligence

The Company considers that the risk of modern slavery within its own business is low; all employees work in roles that are low risk e.g. office-based roles that require specialist training or qualification. The Company considers the risk of slavery or human trafficking is most likely to be found in its supply chain, although the risks within its supply chain remain low. The Company's supply chain generally involves regulated professional advisers (legal advisers, tax firms, accountants).

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, plus evaluating the modern slavery and human trafficking risks of each new supplier - invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

As part of the Company's initiative to identify and mitigate risk, the Company will continue to:

- identify and assess potential risk areas in supply chains;
- mitigate the risk of slavery and human trafficking in supply chains;
- monitor potential risk areas in supply chains;
- and protect individuals who speak up where there are concerns about potential issues or suspicions of modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. The Company is committed to ensuring that no individual suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery, of whatever form, is or may be occurring anywhere in the business or within its supply chains.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including:

- use of labour monitoring and payroll systems;
- communication and personal contact with the next link in the supply chain to verify their understanding of, and compliance with, our expectations.

This Modern Slavery and Human Trafficking Statement will be monitored for effectiveness, reviewed annually and updated as necessary. The Board of 4-Xtra Technologies Limited endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: David Potter
Position: CEO
Date: 16th May 2023
Signature:

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David Potter
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