

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 19 November 2020.

Cygnify Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

Cygnify Ltd has business operations in the United Kingdom.

We operate in the business management and contact centre sector. The nature of our supply chains is as follows: We work with suppliers and contractors, who provide us with software platforms and industry expertise.

For more information about the Company, please visit our website: www.cygnify.co.uk.

Policies

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

These include the following:

- **Supplier code of conduct** - Suppliers are expected to comply with all anti-bribery, anti-corruption, anti-money laundering and modern slavery laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive activities.
Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.
- **Staff code of conduct** - The Modern Day Slavery statement sets out Cygnify's requirements to ensure there is no modern slavery or human trafficking in its supply chain (procurement of services with third party suppliers) or any part of the business. All staff receive annual training on modern day to ensure that remain compliant with our commitments.
- **Procurement policy** - Cygnify's procurement policy is used to draw the attention of employees to the risks relating to modern slavery and child and forced labour, ensuring that they have access to the necessary information.
Due diligence is carried out on ALL preferred suppliers. We will carry out risk assessments for new suppliers to consider the likelihood of maltreatment of staff or other unsatisfactory factors. This may mean that we decide not to work with them or seek further information, or assurances, before

proceeding. For new suppliers, where a higher risk is identified:

If the supplier is required to comply with the Modern Slavery Act 2015, we will request and review their own published policies on modern slavery.

All suppliers: we seek declarations that they meet appropriate requirements and may ask them to give information on their procurement and working practices.

We will apply appropriate vetting procedures, based on the level of risk identified, to ensure we are comfortable that any risks involving slavery can be identified and addressed promptly.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.

We do not consider that we operate in a high-risk environment because We use UK-based partners and contractors and as a small business, as limit the number of suppliers we use. In addition, we do not trade tangible finished goods.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 12 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.
- We will carry out a regular audit of suppliers - 100% of suppliers each year.

Training our staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

The statement was approved by the board of directors.



Ivy Swan, Director
Cynify Ltd

09.01.20
Date