



Modern Slavery Act Statement 2022

National Vetting Solutions UK Ltd / Modern Slavery Act Statement 2022

This statement is made pursuant to the UK Modern Slavery Act of 2015, and the Australian Modern Slavery Act of 2018, to disclose the steps taken by National Vetting Solutions UK Ltd (collectively, the "Company") to combat and prevent slavery, forced labor or child labor in our business operations. While the UK Modern Slavery Act of 2015, and the Australian Modern Slavery Act of 2018 may not technically apply to all of the Company, the practices and commitments described herein are applied by the Company globally. We oppose slavery, forced labor, child labor and human trafficking in all its forms and make this statement to establish the steps we take to ensure there is no slavery or human trafficking in our business operations and our supply chain.

About Us

We are the Premier Security Vetting and Pre-Employment Screening specialists. We are the highest accredited and certified vetting company within the UK. We manage the vetting for small, medium and some of the largest companies within the UK, with full international capability. This commitment includes protecting human rights and acting with honesty and integrity in everything we do. We do not tolerate any form of discrimination, harassment, slavery, forced labor or human trafficking in any part of our business, including with respect to those we do business with. Our supply chain mainly consists of subcontractors, data providers and vendors as well as suppliers of IT and communications equipment and services; property, office cleaning and other facilities management services; office equipment and supplies; and professional services such as auditors, legal and financial service providers, and recruiters.

Our Commitment

We work to combat and prevent slavery in our operations and with respect to our vendors and suppliers by exercising due diligence with respect to those we do business with, continuously vetting those we do business with, and requiring our employees to complete training on our Global Code of Conduct and other relevant policies. We expect our employees to report any known or suspected violation of our Global Code of Conduct and our Global Supplier Code of Conduct, including violations related to slavery, forced labor, child labor or human trafficking, as well as any other form of discrimination.

Due Diligence

The Company is committed to identify and monitor the risk of slavery and human trafficking in its supply chain. The Company has established a Global Supplier Code of Conduct under which we conduct due diligence of suppliers and sub-contractors to ensure that they are committed to ethical labor practices as well as other laws applicable to our operations, such as anti-corruption, global sanctions, anti-bribery, data privacy and information security. Such due diligence is ongoing throughout our relationship with the supplier or sub-contractor to ensure compliance with our position on slavery and human trafficking. The due diligence process varies based on the type of supplier or subcontractor, the location of the supplier or subcontractor and other relevant factors but our diligence process may include such things as the evaluation of: legitimacy and structure of their organization; identifying business locations, practices, and operations; screening for legal and financial red flags, sanctions, litigation, regulatory violations, and ongoing investigations; analysis of their policies and compliance programs; and gathering references from other companies using the supplier or subcontractor. Likewise, we credential our clients to ensure they are legitimate, active, and registered legal entities that are subject to compliance with relevant laws and regulations prior to entering a business relationship with them. All clients must further attest to compliance with all applicable laws and acknowledge that our services will only be used for declared legally permissible purposes.

Training

All employees of the Company are held to high standards of quality and professionalism, and certain member of our team with responsibility for managing our supply chain are trained to ensure they can verify the identities of persons and the legitimacy of entities with which the Company engages. Additionally, through training and



experience, our employees remain well-equipped to identify fraudulent or stolen documents, noncompliance with relevant laws and regulations, and other red flags related to the operations of the supplier or other third-party.

Assessment and Ongoing Commitment

We understand that the Company is at lower risk for human rights violations in our operations and supply chains due to the nature of our services and products, which necessitate mostly skilled labor and require minimal travel. Despite this fact, our efforts to ensure that we are not enabling, contributing, or are otherwise linked to slavery or human trafficking are continually refined to minimizing our potential exposure, by controlling for evolving risks through strict adherence and routine updating of our policies and due diligence practices. As new trends and risks emerge, the Company maintains committed to complying with the Modern Slavery Act and other similar laws, cooperating with the combatting of forced labor and human trafficking, and holding ourselves and those with which we do business accountable to do the same.