

# MODERN SLAVERY POLICY STATEMENT OF INOAPPS LIMITED (“INOAPPS”)

**1 AUGUST 2021 – 31 JULY 2022**

## POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, human trafficking, forms of child labour, debt bondage, slavery like practices, forced marriage, and/or deceptive recruiting for labour or services, 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. Inoapps have a zero-tolerance approach to modern slavery and we are committed to treating all workers with respect and dignity, ensuring safe working conditions and acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. Transparency and Respect being 2 critical values at the core of our business. We expect the same high standards from all of our contractors, suppliers and other business partners.

This statement describes the actions taken by Inoapps during fiscal year ending 31 July 2022 to prevent modern slavery and human trafficking in its business and supply chain.

## INOAPPS' ORGANISATIONAL STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Inoapps is a global Oracle partner providing digital transformation services to a wide range of customers globally. Inoapps offers a comprehensive suite of solutions including strategic business consulting, application and infrastructure implementation, proprietary SaaS solutions, cloud migrations and managed services. Part of a larger group of entities with a parent company incorporated in Delaware, US, it is headquartered in Aberdeen, and has business operations globally, including in the United Kingdom, the United States, Malaysia, Singapore, India, and EU. The Inoapps group employs approximately 1,500 people worldwide.

To find out more about the nature of our business, please visit our website – [www.inoapps.com](http://www.inoapps.com).

In order to provide digital transformation services, we work with a range of suppliers, including Oracle, third party software and technology providers and data centres. We also engage a number of independent contractors to supplement our workforce and expand our expertise, and work with a range of professional advisors and indirect suppliers providing everything from marketing services to office supplies.

## INOAPPS' POLICIES IN ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING

As part of our commitment to combating modern slavery, we have implemented the following policies:

- Inoapps' Modern Slavery Policy
- Business Ethics Policy

All Inoapps personnel are required to comply with these policies in all countries where Inoapps operates. We also make sure our suppliers are aware of our policies, and adhere to the same high standards. Any violation of these standards by an Inoapps employee can result in disciplinary action, including termination of employment. Any violation by a supplier may result in termination of contract.

## DUE DILIGENCE

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we enforce our policies through supplier contracts and supplier assessments and audits.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

## RISK AND COMPLIANCE

Inoapps regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain through various methods, including due diligence, contractual provisions and monitoring political and other environmental influences globally. We seek to limit the amount of suppliers we work with, and look to work with suppliers with proven track records and high internal standards. We assess factors such as country and sector risk profiles, external reports and standards, publicly available risk assessment ratings, membership of organisations where codes of conduct form part of the membership criteria, supplier self-assessment findings, and third party or Inoapps audit results.

We ensure all our suppliers adhere to our modern slavery and business ethics policies. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies we will immediately seek to terminate our relationship with the relevant supplier.

We strongly encourage our personnel to raise concerns to management, human resources, legal or anonymously, and make it clear they can do so without fear of reprisals or retaliation.

## EFFECTIVENESS

Inoapps recognises that its review and assessment of its actions to identify and address modern slavery risks in its operations and across its supply chain will be an ongoing and evolving process. Inoapps will continue to monitor the effectiveness of the process and procedures and will continually assess the effectiveness of its actions by tracking outcomes, partnering with suppliers, and undertaking regularly internal governance and external assurance processes. Inoapps is committed to drive continuous improvement of its existing policies.

## TRAINING

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

## CONCLUSION

Given the nature of our business and supply chains, and the risk assessments we have undertaken to date, we believe the risk of modern slavery in our supply chain is low, however we are not complacent and Inoapps remains committed to its responsibility to respect human rights across all operations. We are committed to driving continuous improvement within our organisation and supply chain and are ready to evolve in response to changing political and environmental circumstances and the evolution of our business.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Inoapps' slavery and human trafficking statement for the financial year commencing 1 August 2021 and ending 31 July 2022.

This statement was approved by the board of directors on 14 October 2022.



**Ally Rule, Director and CFO**

**Inoapps Limited**

Date: 14 October 2022