

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial year ended 31 December 2024

Absorb Software UK Ltd. and its subsidiaries, affiliates, and related entities (collectively, "**Absorb**," "**we**," or "**us**") oppose slavery and human trafficking in all its forms. This statement sets out the steps we have taken in financial year 2024 to ensure that there is no slavery, servitude, forced or compulsory labour, and human trafficking ("**modern slavery**") in our business or in our supply chains.

### 1. **About Us**

Absorb is the provider of a learning management SaaS solution. We are making this statement to demonstrate our zero-tolerance stance on modern slavery and to show our commitment to ethical trading principles and to set out the steps we are taking to identify risks and tackle modern slavery and human trafficking in our business and in our supply chains.

Our structure, business and supply chains mainly consist of the following:

- Business overview - We deliver a cloud-based Learning Management System (LMS) that hosts, tracks and reports training for corporate and educational clients globally.
- Legal structure & workforce - Private limited company registered in England & Wales with 21 permanent employees; with global affiliated entities and employees.
- Supply chains - Primarily technology-based: cloud-infrastructure providers, content-hosting, software-development tool vendors, and office services. Physical goods (e.g., employee laptops) account for < 5% of spend and are procured from reputable distributors.

We recognize that given the nature of our sector—software as a service—our inherent modern-slavery risk is lower than that faced by manufacturing or agriculture; however, we recognise the potential for elevated risk in certain geographies and in subcontracted technical labour.

### 2. **Policies & Governance**

We uphold a comprehensive set of policies that anchor our pledge to eliminate modern slavery and human-trafficking risks throughout our business and supply chain. These documents are reviewed and refreshed on an ongoing basis.

- Anti-Slavery & Human Trafficking Policy – our primary framework for ethical conduct, establishing robust controls to prevent and detect any form of forced labour.
- Respectful Workplace Policy – promotes dignity, fairness, and the right to a safe working environment for all personnel.
- Vendor Approval Process – embeds due-diligence checks and contractual safeguards before onboarding suppliers.
- Environmental, Social & Governance (ESG) Policy – integrates human-rights expectations into broader sustainability goals.
- Health & Safety Policy – protects employee wellbeing and supports safe working conditions.

Collectively, these policies reinforce our commitment to act with integrity across all business relationships and to ensure that modern slavery has no place in our operations or those of our partners.

### 3. Risk Assessment and Due Diligence

Phase	Key Actions	Frequency & Ownership
Procurement Gatekeeping	<ul style="list-style-type: none"> <li>• <b>Mandatory GRC &amp; Legal sign-off</b> on every supplier agreement—no PO or spend can be raised in the finance system until both functions approve.</li> <li>• Legal confirms modern-slavery clause language; GRC verifies risk score and required evidence.</li> </ul>	Continuous—triggered at contract initiation or renewal.
Vendor Assessment for Data Processors	<ul style="list-style-type: none"> <li>• All vendors that store, transmit, or process customer or employee data undergo an annual vendor risk assessment.</li> <li>• GRC assigns a risk rating (low / medium / high), with any high-risk items requiring remediation.</li> </ul>	Annual assessment and with any material service change.
Annual SaaS Portfolio Review	<ul style="list-style-type: none"> <li>• Once a year the GRC and IT teams compile the full list of SaaS subscriptions (including “shadow IT”) from SSO logs and finance data.</li> <li>• High risk vendors are flagged for further review.</li> </ul>	Annually; summary dashboard shared with executives.
Contractual Safeguards	<p>Standard templates include:</p> <ul style="list-style-type: none"> <li>• Zero-tolerance clause prohibiting forced, bonded, or child labour in the vendor’s operations and supply chain.</li> <li>• Strict compliance obligations.</li> <li>• Termination for breach.</li> </ul>	Embedded in master services agreements and data-processing addenda, as applicable.
Monitoring & Escalation	<ul style="list-style-type: none"> <li>• Monitoring announcements.</li> <li>• If a credible allegation arises, convene a rapid-response review (Legal + GRC) to decide on remediation, audit, or contract suspension.</li> </ul>	Ongoing; incident-driven.

#### 4. Supplier Adherence to Our Values and Ethics

We maintain a zero-tolerance stance on modern slavery and human trafficking and apply a proportionate, best-efforts approach to managing the risk in our supply chain.

Our supply-chain compliance programme begins by embedding a modern-slavery clause in every new or renewed contract wherever we have commercial leverage. For large, business-critical, or high-risk vendors we supplement those clauses with a short due-diligence review and public-domain checks of the company’s own modern-slavery statement, regulatory filings, and recent news.

When we contract with global “must-have” providers—where our negotiating power is limited—we satisfy ourselves that the vendor is widely regarded as reputable, is subject to stringent legal regimes (e.g., GDPR, HIPAA, PCI DSS, or SOX), and publishes clear human-rights commitments. We also track the geographic location of key service centres to avoid partnerships in jurisdictions where there is a higher risk of slavery.

At least once a year we review our roster of SaaS and other suppliers to confirm that contractual protections remain in place and that no credible allegations of forced labour have emerged. If a red flag would arise, we would escalate it to senior management and decide—case by case—whether to seek additional assurances, commission an external review, or, if necessary, exit the relationship.

Oversight of this programme sits with a dedicated cross-functional team drawn from Legal, Governance & Compliance, Procurement, and Human Resources. Through these measures we strive to keep modern slavery out of our operations and those of the suppliers on whom we rely, while recognising the practical realities of operating as a SaaS provider of our size.

#### 5. Training and Awareness

Modern-slavery awareness is built into our wider learning ecosystem so that every employee—especially those who touch procurement, vendor management, or customer delivery—can recognise warning signs and know how to escalate concerns.

Component	Audience	Format & Content	Frequency	Success Measures
<b>Onboarding Course</b>	All new hires worldwide	Interactive module hosted in our LMS, exploring what is believed to be a historic problem but what is in fact a very current issue and that is slavery. Looks at the origins of slavery and the types of slavery that exist today, and at how to identify victims of slavery and what action can be taken.	During onboarding period	Completion must hit 100 %

<b>Role-Specific Deep Dive</b>	Procurement, Legal, GRC, Sales Operations	In-depth e-learning course: provides applicable knowledge and effective strategies to conduct thorough human rights due diligence in the supply chain, with valuable insights on how to better supply chain operations and increase your commitment towards corporate social responsibility.	At role entry and upon major policy update	Post-session quiz (pass mark 80 %); tracked in LMS
<b>Annual Refresher</b>	All staff	Quick update with varying themes relating to modern slavery	Annually	Target $\geq 95\%$ completion

By embedding concise, role-appropriate learning throughout the employee life-cycle and backing it with measurable outcomes, we ensure our people stay alert to modern-slavery risks and confident in taking swift, informed action.

## 6. Policy statement

- 6.1 Modern slavery, including slavery, servitude, forced or compulsory labour, and human trafficking, is a crime and a gross violation of fundamental human rights. Absorb maintains a zero-tolerance approach to all forms of modern slavery and is committed to conducting its business ethically, with integrity, and in compliance with all applicable laws, including the Modern Slavery Act 2015.
- 6.2 Absorb is committed to ensuring that modern slavery and human trafficking are not taking place within its own operations or any part of its supply chains. We implement and maintain appropriate policies, procedures, and due diligence processes to identify and mitigate the risk of modern slavery. We expect the same high standards of conduct from all of our contractors, suppliers, and business partners.
- 6.3 As part of our procurement and contracting processes, we include specific obligations prohibiting the use of forced, bonded, or trafficked labour, or any other form of modern slavery. We also require our suppliers to take reasonable steps to ensure that these same standards are upheld throughout their own supply chains.
- 6.4 We are committed to transparency and continuous improvement in our efforts to combat modern slavery, in line with our disclosure obligations under the Modern Slavery Act 2015.