

Anti-Slavery Policy

Modern Slavery and Human Trafficking Statement

ADAMftd Pte Ltd (“ADAMftd”) makes this modern slavery and human trafficking statement under the Prevention of Human Trafficking Act 2014 of Singapore and under Section 54(1) of the Modern Slavery Act 2015 of the United Kingdom (the “Acts”). It confirms the actions taken by ADAMftd to ensure modern slavery is not taking place in any of our supply chains or any part of our business globally.

References to “modern slavery” in this statement follow the definition within the Acts and include, but are not limited to, slavery, servitude, forced labour, child labour, human trafficking, and workplace abuse.

Our Organization

ADAMftd is a global leader in providing comprehensive trade data and solutions, enabling organizations to comply with a myriad of supply chain transparency, anti-slavery, anti-child labour, conflict mineral, and other traceability laws. With our headquarters in Singapore, and its parent organization in the United Kingdom, ADAMftd is dedicated to enhancing supply chain and corporate transparency and ethical business practices worldwide.

Our Supply Chain

ADAMftd operates in a manner and sector where the risk of modern slavery is considered low. Our business does not involve intensive manual labour and we do not operate any manufacturing facilities. Our supply chain broadly consists of contract and outsourced workers, telephone-based support services, and suppliers of goods and services for our offices, such as stationery suppliers, caterers, office cleaners, and marketing merchandise. We are committed to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to help ensure modern slavery does not take place anywhere in our business or supply chains.

Our Principles and Governance

The following policies are in place at ADAMftd to reduce the risk of modern slavery in our business and supply chains.

Code of Conduct

ADAMftd's Code of Conduct outlines our commitment to observing the highest ethical standards to guide our business practices in several areas, including human rights. The Code of Conduct recognizes that we must protect and respect human rights and work with our business partners and suppliers to do the same. Specifically, it places the following obligations on employees to reduce the risk of modern slavery:

- Ensure that slavery, servitude, child labour, prison or forced labour, human trafficking and physical punishment do not occur in any operation of ADAMftd or our suppliers and other business partners.
- Comply with the ADAMftd Anti-Slavery and Human Trafficking Policy.
- Respect the right of employees to organize in labour unions and collectively bargain in accordance with local laws and established practices.
- Speak up if employees are concerned about any possible violation of human rights at ADAMftd.

Anti-Slavery and Human Trafficking Policy

ADAMftd's Anti-Slavery and Human Trafficking Policy confirms our zero-tolerance approach to modern slavery. Modern slavery is a crime and a violation of fundamental human rights and we are committed to ensuring there is transparency in our own business and approach to tackling modern slavery in our supply chain. The Anti-Slavery and Human Trafficking Policy applies to everyone working for or on behalf of ADAMftd in any capacity (including staff members, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners) and encourages employees to report any concerns immediately.

Global Human Rights Policy

ADAMftd's Global Human Rights Policy recognizes that respecting human rights is a core value at ADAMftd, embedded in the way we do business. ADAMftd requires compliance with relevant legislation as well as upholding and respecting human rights as reflected in the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Global Compact, and the UN Guiding Principles on Business and Human Rights, among others. These standards include ensuring that the rights of women and minority groups are protected and that employees can exercise their right to freedom of expression. We expect our employees, agents, suppliers, and business partners to support and respect the protection of human rights in line with our own ethical values and apply the same high standards to all company operations, regardless of geographic location.

Supplier Code of Conduct

Our relationships with our suppliers must be fully transparent, ethical, and in line with the standards expected of our own employees. To this end, our Supplier Code of Conduct sets out the standards we require of our suppliers to reduce the risk of modern slavery. The Supplier Code of Conduct requires suppliers to comply with the Acts, the commitments in this Modern Slavery and Human Trafficking statement, and the Anti-Slavery and Human Trafficking Policy to ensure that modern slavery does not take place in their business or supply chains. Suppliers are also required to make all necessary inquiries with their own suppliers and, to the extent reasonable, other parties in the supply chain.

Anti-Bribery and Corruption Policy

ADAMftd's Anti-Bribery and Corruption Policy requires our business to be conducted in an ethical, legal, and responsible manner, consistent with our zero-tolerance of slavery and human trafficking in all forms.

Whistleblowing Policy

Our Whistleblowing Policy encourages a culture of openness and transparency across the business so our staff and suppliers can speak up where they feel our people or customers are at risk, or where areas of wrongdoing have been identified or are suspected. For the purposes of the Whistleblowing Policy, "wrongdoing" includes endangering the health and safety of any individual, as well as anything that would breach the Code of Conduct and related policies. It explains how to raise a concern, including by staff speaking to their manager, their manager's manager, or the relevant head of department. Staff and suppliers can also contact the Legal Department or, if anonymity is preferred, use an independent telephone and web reporting service.

Risk Assessment and Due Diligence

We remain committed to maintaining zero-tolerance of any form of modern slavery in our business or supply chains. We operate a risk-based approach which includes clearly informing our suppliers of our obligations under the Act and the ethical standards required of them.

We review our supply chain practices, systems, and controls on an ongoing basis to identify, assess, and monitor potential risk areas and find ways to further mitigate the risk of modern slavery occurring. We include requests for information on modern slavery and our supply chains in our Requests for Proposals.

Some of the practices and controls we have implemented include:

- Including in ADAMftd's standard form purchase order terms express obligations upon suppliers to comply with all applicable anti-modern slavery laws and ADAMftd's Modern Slavery and Human Trafficking Statement.
- Providing our suppliers with our policies on preventing modern slavery and requiring compliance in all parts of their business.
- Requiring suppliers to take all reasonable steps to ensure that modern slavery does not take place in their own supply chains.
- Requiring suppliers to immediately notify ADAMftd if they become aware of any such circumstances.

Everyone at ADAMftd is encouraged to remain mindful of any modern slavery risks that may face the company and to report any concerns using the appropriate channels immediately.

We aim to be a company with the highest level of ethical standards in how we treat our employees and do business with our partners, customers, and suppliers. In pursuit of this aim, we implement and enforce rigorous standards in our relationships with our suppliers, customers, and partners and apply stringent due diligence requirements when entering any new association to prevent inappropriate, illegal, or corrupt behaviors or activities. For example, we screen prospective business partners to ensure that there are no red flags associated with the relevant partner from a compliance or modern slavery perspective.

Training and Awareness-Raising

Information on the importance of avoiding modern slavery and ADAMftd's policies and procedures in this area is included in the annual Code of Conduct training. The Code of Conduct training is mandatory for all employees and includes a test which all employees must pass to complete the training.

Responsibility, Monitoring, and Reporting

To date, ADAMftd has not identified or received any reports that it has caused or contributed to slavery or human trafficking. Should any issues be identified in relation to slavery or human trafficking, we have appropriate processes in place throughout the company to enable remediation, including our Whistleblowing Policy and whistleblowing telephone and web reporting service.

We will continue to review the effectiveness of the steps we are taking to identify any potential risk areas and remain committed to improving our practices and procedures to combat slavery and human trafficking. To the best of our knowledge, slavery and human trafficking do not exist in our organization or our supply chain.

This statement constitutes ADAMftd's Modern Slavery and Human Trafficking statement. It was approved by the board of directors of ADAMftd Pte Ltd on 30th June 2024.

Signed,



James York
Chief Executive Officer
ADAMftd Pte Ltd