



# STATEMENT ON ADHERENCE TO ANTI-SLAVERY AND HUMAN TRAFFICKING PRINCIPLES THROUGHOUT THE SUPPLY CHAIN

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# 1: Policy Statement

Ensono is a managed IT service provider, covering mainframes, distributed systems and cloud platforms. Ensono's 'business critical IT' approach combines a focus on business outcomes together with a structured client engagement methodology and supporting services and infrastructure. Ensono group operates internationally, with its headquarters situated in the USA (Downers Grove, Illinois) and offices in the UK, Germany, India and Poland.

Ensono is committed to its role in the fight to tackle modern slavery and human trafficking. We are strongly opposed to the unethical treatment of people, including any acts of slavery or human trafficking, and we continue to be committed to ensuring that we trade ethically, source responsibly, and work to prevent modern slavery, forced labor and human trafficking throughout our organization and in our supply chain, including by ensuring that all vendors in our supply chain prohibit the hiring of slave and forced labor and prevent practices that contribute to human trafficking.

## 2: Scope

This statement covers Ensono, Inc., a corporation incorporated in Delaware, US, along with its direct and indirect subsidiaries including Ensono, LLC, a limited liability company established in Delaware, US, Ensono Limited, a company incorporated in the UK, Ensono Technologies LLP, a limited liability partnership established in India, Ensono GmbH, an entity established in Germany, and Ensono sp. z o.o., a subsidiary incorporated in Poland each part of the Ensono Group.

This statement highlights the approach we are taking in the course of the financial year January 31, 2022 - December 31, 2022, to combat modern slavery in our organization and supply chain.

## 3: Roles and Responsibilities

Various teams within Ensono have responsibility for upholding Ensono's anti-slavery initiatives as this initiative crosses multiple business operations.

- Legal: carry out supplier assessment processes for new and previously unused suppliers, updates supplier assessment policies and questionnaires in line with particular risks and legal requirements.
- Procurement: carry out supplier assessment as necessary when onboarding a new supplier or entering into a new contract or renewal with a supplier;
- Culture and People Experience: exercise oversight to ensure that no modern slavery practices take place within the business, including ensuring that all employees have a right to live and work in their country of residence, are paid in accordance with any minimum wage regulations and that any complaints, issues or other concerns are dealt with in a manner that maintains the fundamental human rights of each individual.

We are committed to continuous improvement of our processes and procedures to ensure that no form of forced or compulsory labor or trafficking of persons exists within our supply chain.

## 4: Ownership

The Legal Department is responsible for resolving questions of interpretation about this policy.

## 5: Policy

### 1. Structure, Supply Chain & Responsibility

#### 1.1. Structure

Ensono carries out managed IT services for its clients, who span a range of industries and organization sizes. Its business is operated predominantly in the USA, the UK and India, with a smaller physical presence in Germany and Poland; we also utilize hardware and software sub-contractors and vendors internationally.

#### 1.2. Geographic Scope, Impact Assessment & Supply Chain

The majority of our suppliers are large, international companies that maintain similarly stringent anti-slavery policies to Ensono. In addition, our key vendors and subcontractors are predominately located in the USA, Australia and Canada, which we believe to be lower risk countries with respect to modern slavery practices.

#### 1.3. Our Policies and Procedures on slavery and human trafficking

We have policies and procedures in place that underpin our commitment to ensure that there is no modern slavery, forced labor or human trafficking in our supply chains or in any part of our business. We regularly review and update all our policies. Some of these policies include:

- Ensono's Code of Conduct and Ethics and Guidelines
- Supplier Code of Conduct
- Whistleblower Protection Policy

#### 1.4. Working with Suppliers

Since 2016, our standard supplier contracts contain provisions requiring our suppliers adherence to the Modern Slavery Act, 2015. In the event of a violation of this provision, Ensono reserves the right to terminate its relationship with the supplier.

Furthermore, our Supplier Code of Conduct requires that our suppliers:

- Provide safe and healthy working conditions at all their operations and meet or exceed all legal requirements for compensation.
- Treat people with dignity and respect, and specifically:
  - Not employ child labor, consistent with the principles contained in the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at work.
  - Prohibit forced labor consistent with ILO Convention No 29, on Forced Labour and basic principles contained in the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at work for elimination of all forms of forced or compulsory labor.

## Anti-slavery Statement

- Not treat or threaten to treat an individual harshly or inhumanely. Harsh or inhumane treatment includes sexual harassment or abuse, corporal punishment, coercion, or verbal abuse.
- Not engage in human trafficking (as defined by the UN in Article 3, paragraph (a) of the Protocol to Prevent, Suppress and Punish Trafficking in Persons and as required by the California Transparency in Supply Chains Act of 2010)
- Comply with applicable wage and hour labor laws of the country in which they operate, including through adherence to rules designed to limit overtime
- Prohibit the use of forced, bonded (including debt bondage) or indentured labor or involuntary prison labor. All work will be voluntary, and workers should be free to leave work or terminate employment upon reasonable notice. Prohibited actions include transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.  
Comply, at a minimum, with the applicable labor and environmental laws and regulations of the country where the materials and products are produced.

### 1.5. Staff training and on-going anti-slavery initiatives.

Ensono's Code of Conduct prescribes certain values and principles which Ensono has committed to worldwide. This Code of Conduct specifies certain nonnegotiable minimum standards of behavior in key areas such as fairness, honesty, and compliance with all laws.

The Code of Conduct has been provided to all of our associates globally. Associates are required to annually certify that they have read and agree to comply with Ensono's Code of Conduct.

## 6: References and Related Documents

Include other policies that either impact or are impacted by this policy, process, procedure and which should be read in conjunction with this policy, process, procedure.

### Ensono Standard Processes

Code of Conduct and Ethics and Guidelines

Supplier Code of Conduct

## 7: Definitions

Definition of acronym or terminology used within the document.

Jargon/ Acronym/ Term	Definition / Description
<b>Statement</b>	Any Ensono corporate governance guidance in the form of a policy or procedure
<b>The Company</b>	Refers to Ensono