

SIMPLYTURE UK MODERN SLAVERY ACT STATEMENT

Structure, Business and Supply Chain.

Simplyture is one of the largest suppliers of ANPR parking solutions in Denmark; our branding reflects quality and reliability.

We are serious about our brand because it's part of our identity and so is our commitment to corporate social responsibility. We believe transparency is the best way we can ensure the public that we are doing our best as an ethical corporate citizen. In that spirit, we have published our annual statement for slavery and human trafficking, made in compliance with section 54 of the Modern Slavery Act 2015, in which we explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it. Our efforts against slavery and human trafficking complement our broader CSR Policy and our adoption of the Ethical Trading Initiative.

Simplyture is headquartered in Copenhagen, Denmark and sells its products throughout Europe, including the United Kingdom. Our product range makes use of the highest quality cameras, software and bespoke payment kiosks, which for the most part are sourced from Europe. This allows us to focus our oversight and influence over one discrete geographic region. We have over 20 employees within our organisation in addition to approximately 30 workers who are engaged through our supply chain, installation and maintenance partners. Where possible, we engage suppliers who have relationships with existing suppliers so that we can contain our supplier network and improve consistency in ethical practice throughout the supply chain.

Building on our existing CSR Policy and our commitment to the Ethical Trading Initiative, we have embraced the requirement to publish an annual slavery and human trafficking statement. This will allow us to share our efforts against slavery and human trafficking and improve and measure our success each financial year.

Slavery and Human Trafficking Policies.

Notably, we developed our Slavery and Human Trafficking Policy, which can be found within our CSR Policy. We also updated our Supplier Code of Conduct. It sets out clear objectives for 1-, 3- and 5-year slavery and human trafficking plans around the following themes:

- > Relationships: Strengthening our supplier engagement process.
- > Feedback: Establishing grievance mechanisms and channels for individual worker feedback.
- > Knowledge: Improving our knowledge base by collecting relevant data and improving product traceability.
- > Third party engagement: Building strategic alliances with independent social auditors, unions and NGOs.
- > Measurable change: Developing verifiable KPIs to measure progress.
- > Supplier collaboration: Encouraging suppliers to collaborate to address slavery and human trafficking issues.
- > Incentives: Developing mechanisms to incentivise employees and suppliers to address slavery and human trafficking and improve labour standards.
- > Accountability: Establishing a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting.

Due Diligence Procedures.

We understand that our biggest exposure to Modern Slavery is in our product supply chains, where we have undertaken activity over the past few years to minimize the risk of Modern Slavery. Within these areas, new suppliers and factories/sites are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and factories/sites. These audits assess compliance with the Global Sourcing Principles and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

Identifying, Assessing and Managing Risk.

We set out to identify the extent of any slavery and human trafficking in our supply chains by:

- > Conducting internal spot-checks at factories in Sweden and Portugal.
- > Engaging third party auditors to conduct social audits at 3 supplier sites.
- > Interviewing workers to discuss their conditions and their rights.
- > Collaborating with 2 of our suppliers to develop an improvement plan to address new and previously identified slavery and human trafficking issues.

Key Performance Indicators.

In order to assess the effectiveness of our modern slavery measures we will be reviewing the following key performance indicators:

- > Staff training levels.
- > Number of slavery incidents reported in the supply chain.

Training Available to Staff.

A key part of our slavery and human trafficking strategy is to promote cultural change through training. This last financial year we:

- > Delivered online training modules on modern slavery to all staff.
- > Training seminars for our suppliers' factory managers at our suppliers in Portugal.
- > Started development of a dedicated training and resources webpage which individual workers in the supply chain will be able to access to learn about modern slavery and human trafficking, understand their rights and anonymously report any slavery and human trafficking issues in their workplace.