

Globalization Partners Ltd.

Modern Slavery Statement

Financial Year End 30/04/2021

This statement sets out Globalization Partners' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the Global Expansion industry, we recognize that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously at all times.

Our organization is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organizational structure and supply chains

This statement covers the activities of Globalization Partners Ltd:

- Globalization Partners Ltd. simplifies global business by enabling companies to hire and retain team members in 178 Countries. We act as an employer of record and hire employees to work for our clients. All employees are employed under a contract of employment in most cases and are wholly supported by Globalization Partners as their employer.

Countries of operation and supply

As a global organization, Globalization Partners has contractual relationships with thousands of companies worldwide. However there are a few countries that support the business in the UK such as:-

- United States of America; and
- Ireland;

Our Policy

The policy of Globalization Partners is to conduct all our business in an honest and ethical manner, and to comply with all applicable legislation in each and every country. We strive to ensure that neither modern slavery nor human trafficking supports our supply chain or our business in any capacity. We aim for a zero-tolerance approach to violations of anti-slavery and human trafficking laws.

If breaches of these laws are found within our supply chain, we will look to support organizations in their efforts to comply with the applicable legislation. Globalization Partners will review the continuation of business with individuals and organizations found to be involved in slavery, human

trafficking, forced or child labor and retains the right to cease business with such individuals and organizations on this basis.

Globalization Partners is committed to acting professionally and with integrity in all its business dealings and relationships in all jurisdictions that it operates.

In this context, Globalization Partners has created a dedicated Anti-Slavery and Human Trafficking Statement.

Reporting knowledge or suspicion of slavery or human trafficking

All employees and professionals have a statutory obligation to report knowledge or suspicion of slavery or human trafficking. Any genuine suspicion or knowledge of slavery or human trafficking is to be immediately reported to their Manager, the Compliance Department or through the company's confidential reporting hotline, operated by a third-party provider, EthicsPoint. This hotline allows employees to report confidential concerns or suspicions of slavery or human trafficking either through a telephone hotline or reporting website. Employees and Professionals who raise concerns of slavery or human trafficking in good faith may do so without fear of discrimination or reprisal.

These provisions do not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, these must be fully complied with.

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** Globalization Partner Global Code of Conduct; Whistleblowing policy along with statutory HR Policies.
- **Investigations/due diligence:** Globalization Partners has a confidential reporting hotline, operated by a third-party provider, EthicsPoint. This hotline allows employees and professionals to report confidential concerns either through a telephone hotline or reporting website. The information provided is sent to the appropriate HR or Legal representative by EthicsPoint on a confidential basis. Investigations are conducted in an independent and thorough manner. In addition, as described above, victimization is strictly prohibited.
- **Training:** Globalization Partners is in the process of developing a training module for professionals and employees to better understand and respond to the identified slavery and human trafficking risks. We are going to require all employees to have completed training on modern slavery and human trafficking by 30th June 2022.

We want to help our employees, to understand more about these issues and understand how to report any suspicions they may have related to modern slavery and human trafficking. The topic of Modern Slavery will become a part of our induction training undertaken by new employees starting with Globalization Partners.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Global Code of Conduct**

Our code makes clear to employees the actions and behavior expected of them when representing our organization. We strive to maintain the highest standards of employee conduct and ethical behavior when operating abroad and managing our supply chain.

- **Whistleblowing Policy**

We encourage all our employees and other business partners to report any concerns related to the direct activities, or the supply chains of our organization. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of victimization. Employees, who have concerns, can use our confidential helpline or report the suspicion online.

Looking forward

We are currently developing an online training course which we will require all employees to complete by 31st March 2022. This course will include:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organization.
- what steps our organization should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Globalization Partners will continue to develop and implement the measures mentioned above in respect of our supply chain.

Our approach to modern slavery and human trafficking risk will continue to evolve and we will continue to mitigate these risks through the provisions mentioned above during 2022 and beyond.

Globalization Partners shall take responsibility for this statement and its objectives, and it will be reviewed and updated as appropriate.



Director approval

This statement was approved on 1st March 2022 by Mr Todd Goffman, General Counsel and Director who has reviewed this statement and will update it annually.

Mr Todd Goffman Signed by:

Signature: 
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Date: