



NORTH TECH INC
Oklahoma City, OK

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

I. PURPOSE

To ensure that North Technologies educates employees and contractors on our commitment to tackle modern slavery and human trafficking. To ensure that North Technologies complies with Section 54 of the Modern Slavery Act.

II. INTRODUCTION

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At NORTH TECH INC, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2020.

III. OUR BUSINESS AND SUPPLY CHAINS

NORTH TECH INC is in the business of technology and software development. We provide both canned software packages as well as custom software development services. As such we rely on employees and contractors from around the world.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

IV. RISK ASSESSMENT

In the past year, we conducted a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

V. POLICIES

NORTH TECH INC operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Purchasing Code - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

VI. SUPPLIER DUE DILIGENCE

NORTH TECH INC conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements
- We require all suppliers to attest that:
 - They don't use any form of forced, compulsory or slave labour
 - Their employees work voluntarily and are entitled to leave work
 - They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
 - They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
 - They don't require employees to surrender their passports or work permits as a condition of employment

VII. AWARENESS

NORTH TECH INC has raised awareness of modern slavery issues by putting up posters across our facilities and sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

VIII. TRAINING

In addition to the awareness programme, NORTH TECH INC has rolled out an e-learning course to all employees and supplier contacts, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps ABC plc will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by ABC plc's anti-slavery policy

IX. MEASURING HOW WE'RE PERFORMING

NORTH TECH INC has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?
- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?
- What are the findings of our cross-functional Human Rights team, which reviews how we are addressing modern slavery and human trafficking?

This statement covers 1 April 2020 to 31 March 2021 and has been approved by the board of NORTH TECH INC at the board meeting on 3 April 2020.



Matt Spinks

CEO

3/3/2020

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