



## **MODERN SLAVERY STATEMENT FOR DISPERSE.IO LIMITED (“THE COMPANY”)**

### **FINANCIAL YEAR ENDING NOVEMBER 2020**

#### **INTRODUCTION**

The Company is committed to improving its practices to ensure slavery and human trafficking are not taking place in any part of its business or its supply chain and this statement sets out the steps it has taken during the financial year.

The Company expects the same commitment from its suppliers, contractors and business partners.

#### **ORGANISATIONAL STRUCTURE**

The Company is a limited company with three, wholly owned subsidiaries. The Company is an artificial intelligence construction start-up that focuses on improving the productivity of construction projects.

#### **OUR SUPPLY CHAINS**

Our key supply chains comprise:

Technology Service Providers - including Managed Hosting Services, Cloud Solutions, Software Licenses and Hardware Supply.

People Services - including Recruitment Agencies, Professional Service Advisors and Benefits Providers; Data Annotation Providers; Consulting Services, Business Development & Marketing Services; Contractors and Freelancers.

Facilities Management - including Building Maintenance, Refreshment Providers and Office Consumable Suppliers, transport and logistics.

#### **OUR APPROACH TO SLAVERY AND HUMAN TRAFFICKING**

The Company is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of our business. The Company acts ethically and with integrity in all its business relationships. The Company promotes and implements proportionate effective systems to ensure slavery and human trafficking is not taking place anywhere in the business or its supply chains.

#### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of the Company’s supplier due diligence processes into slavery and human trafficking, our supplier approval (and renewal) process incorporates a review of the controls undertaken by the supplier in relation to slavery and human trafficking according to the level of risk for each supplier. The Company has similar due diligence arrangements for existing and prospective business partners/clients and parties to whom payments and services are made/provided.

Although it mainly operates in the UK and USA, the Company appreciates that suppliers of goods and services from sources from outside the UK, EU and USA are potentially more at

risk for slavery/human trafficking issues. The level of management control required for these sources is continually monitored.

The Company engages in business partnerships with established and reputable business partners/clients, with whom it aims to build long-term partnerships.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

The Company has in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Obtain legal advice/review in relation to contractual arrangements with business partners/clients.

The Company has assessed the risk to its business from modern slavery as being low-medium.

### **THIRD PARTY ADHERENCE TO COMPANY VALUES**

The Company has zero tolerance to slavery and human trafficking.

- To ensure all those in the Company's supply chain and contractors comply with Company values, we have in place a supply chain compliance programme. This consists of carrying out the due diligence as referred to above as to the potential level of risk of slavery and human trafficking for any new suppliers or business partners/clients.
- Should we discover that any of our suppliers or business partners/clients tolerate or turn a blind eye to modern slavery, we would take steps to terminate our business relationships with them at the earliest practical opportunity.

We have appointed an individual within the Company to be responsible for monitoring and reviewing compliance with the law and periodically reporting to the board on this area.

### **TRAINING AND COMMUNICATION**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, the Company will:

- publish this statement on its website;
- introduce anti-slavery and human trafficking provisions in its company policies;

- introduce staff training;
- promote internal and external communication of this issue; and
- introduce a standard modern slavery/human trafficking clause in our terms and conditions.

## **FURTHER STEPS**

In future, we will use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- **Vetting procedures.** The number or percentage of existing and prospective suppliers and business partners/clients that have been vetted for ethical labour practices.
- **Due diligence.** The number and type of issues identified in due diligence of suppliers and sub-contractors.
- **Whistleblowing.** The number of reported breaches in the past year.
- **Training.** The number or percentage of staff trained.
- **Remedial action.** The instances of remedial action being needed.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending November 2020.

**Felix Neufeld**



**Chief Executive Officer**

**12 February 2020**