

## **Modern slavery statement for 1 February 2017 to 31 January 2018**

This statement sets out the steps that Mitrates Holdings, Inc. ("Mitrates") has taken and is continuing to take to ensure that modern slavery and human trafficking is not taking place within our business or supply chain. This statement relates to the period 1 February 2017 to 31 January 2018.

Mitrates has a zero tolerance approach to any form of modern slavery, including servitude, human trafficking and forced labour. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against modern slavery within our business and supply chain.

### **Our Business**

This statement covers the activities of Mitrates Holdings, Inc. and its subsidiary companies (as defined under the Companies Act 2006):

- Mitrates is committed to solving the complex needs of legal and compliance professionals. Today, our market-leading legal, compliance, and operational risk solutions enable corporations of all sizes across the globe to manage risk and associated costs with transparency, predictability, and control.
- Mitrates has offices in the United States, United Kingdom, and Australia, with the majority of our business conducted within the United States. Our contractors and suppliers are primarily based within the United States and United Kingdom.
- Products, services and software development are generally provided in-house by Mitrates, rather than by third parties.

### **Risk Assessment**

Mitrates has reviewed material suppliers to assess whether any particular risks of slavery or human trafficking arise. We do not consider that key relationships with professional or business services suppliers, such as those who provide hosting support services, give rise to material risks in this area. Risk may however have the potential to arise in relation to services such as internal facilities management, catering and the supply of office electronic equipment. We manage this risk through the use of suppliers whom are considered to be reputable, and we have specifically requested all material regular suppliers to confirm that their own business activities and supply chain do not involve slavery or human trafficking.

### **Our Policies**

We operate a number of internal policies to ensure we conduct business in an ethical and transparent manner. These include:

- Recruitment policy. We conduct eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees, without fear of reprisals, can raise concerns about inappropriate behaviour and practices across our business or supply chain.
- Employee handbook. This handbook explains our code of conduct; the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### **Our Performance Indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, suppliers, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

### **Steps taken in 2017**

(A) Management responsibility and general awareness

- Agreed management responsibility for this statement and received unanimous endorsement from the Board.
- Raised general organisational awareness.

## (B) Risk assessment

- Undertaken assessments using legal, risk and procurement teams to determine risk exposure.
- Included the Modern Slavery Act 2015 within our necessary risk assessments to ensure the risk continues to be flagged, assessed and appropriately addressed.

## **Steps Mitratesch will take in 2018**

### (A) Management responsibility and general awareness

- Report progress to the executive management team and the Board.
- Raise awareness of this published statement to suppliers who are regularly engaged with.
- Prepare our second annual statement.
- Endeavour to incorporate Anti-Slavery sections into the employee handbook that is introduced to staff as part of the induction process and made available on the intranet for all employees. Those Anti-Slavery sections set out Mitratesch's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

### (B) Risk assessment

- Commence a review exercise of the Anti-Slavery sections of the employee handbook against Mitratesch's activities to establish whether the approach taken follows emerging best practice by:
  - Assessing and interpreting any recent or emerging case law and best practice;
  - Benchmarking activities against statements and action plans undertaken by similar organisations; and
  - Re-evaluating the risk of non-compliance as part of our cyclical compliance risk register assessment.
- Assess new and existing material third party suppliers to identify potential risks.

### (C) Risk mitigation

- Relevant new third party supplier and contractors: Impose provisions for termination in the event of a breach.
- Relevant existing third party suppliers and contractors: Engage with suppliers to ensure that their goods, materials and labour-related supply chains are compliant with the Modern Slavery Act 2015, that they are acting in a transparent, accountable and auditable way which is free from ethical ambiguities.
- Act promptly where a compliance breach has been identified or flagged.
- Continue to feed lessons learned back into our compliance risk management process.

## **Board Approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Mitratesch's statement for the period 1 February 2017 to 31 January 2018.

This statement has been approved by Mitratesch Holdings, Inc.'s board of directors, who will review and update it annually.

Jason Parkman  
CEO  
31 January 2018