

## **MODERN SLAVERY POLICY**

### **1.1. OUR BUSINESS**

eXcentius is a provider of product management and technical due diligence services.

In any element of the services we offer, we directly address modern slavery and we continue to develop our expertise and products to better meet the needs of our clients and customers. eXcentius also assesses its own supply chain against the risk of modern slavery or human rights issues being present.

According to the qualifying criteria of the Modern Slavery Act 2015, eXcentius is not required to produce a policy or statement as we fall below the threshold. However, we believe that it is important to help address this issue. We believe that it is the right thing to do as clear expression of our commitment to tackling modern slavery and a demonstration of the leadership we give to our clients, customers, and supply chain partners.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

### **1.2. THIS, AND OTHER RELEVANT POLICIES**

The eXcentius Board has overall responsibility for this policy and ensuring that employees and

supply chain partners comply with its requirements. To ensure this happens eXcentius has:

1. Ensured that associated policies in relation to procurement and recruitment reflect the commitment to identifying and eliminating modern slavery.
2. Ensured that management processes are reviewed and that they reflect our commitment.
3. Undertaken a risk assessment of eXcentius supply chain partners when becoming a partner, or when having a relationship renewed.
4. Undertaken a 'right to work' check on new employees that encompasses human rights and modern slavery.
5. Introduced an approach to company-wide training on modern slavery and the risk it presents, and what is expected of employees.

### **1.3. REVIEW, REPORTING AND PERFORMANCE INDICATORS**

eXcentius will review the effectiveness of this policy and associated procedures on an annual basis. We will publish our performance in a publicly available statement on our website. We will report our progress against the following performance indicators:

1. Number and percentage of staff trained on modern slavery.
2. Number and percentage of supply chain partners risk-assessed for modern slavery.

Based on the outcome of each annual review we will endeavour to continuously identify ways in which we can raise the performance of eXcentius, our supply chain partners, clients and customers to effectively address modern slavery.

Signed

Paul Oliver, Director

Date: Next Review Date: 05/01/2022

SPV Insights Limited, t/a eXcentius, Modern Slavery Policy v1.1 January 2022

