



Global Policy

Modern Slavery and Human Trafficking Statement

Version 1.1

February 2024

Authored by: Global Head of People Ops & Culture

Table of content

Introduction and Scope	2
Document Owner and Approval	2
Change History Record	2
About Us	3
- Our Business	
- Our Workforce	
- Our Supply Chain	
iProov's Policies on Modern Slavery and Human Trafficking	5
- Public Disclosure Policy	
- Supplier and Supply Chain Management Policy	
- Employee Code of Conduct	
- Employee Handbook	
Training and Capacity Building	5
Supply Chain Risk and Due Diligence	6
Further Commitments for FYE 2024-2025	6

Introduction

This Statement describes the actions taken by iProov during the Fiscal year ended March 2023 to April 2024 (FYE 2023-24) to prevent modern slavery and human trafficking in our business operations and supply chain. It is made pursuant to Section 54 of the Modern Slavery Act 2015.

iProov is a trust service provider and in accordance with our values, we are committed to preventing modern slavery and human trafficking in our operations and supply chains. We possess policies and processes which aid in monitoring and assessing the effectiveness of our actions

Document Owner and Approval

The Global Head of People Ops & Culture is the owner of this document and is responsible for ensuring that this policy is maintained and updated in alignment with iProov’s evolving needs and industry best practices.

Change History Record

Version	Date	Author	Notes
1.0	April 2022	Global Head of People Ops & Culture	Creation of statement for FYE 2022
1.1	February 2024	Global Head of People Ops & Culture	2nd Statement for the FYE 2023 - 2024

About Us

Our Business: iProov is a globally trusted leader in assuring the genuine presence of individuals, by asserting their identity online thus eliminating the need for physical identity verifications and enhancing both security and convenience in the process. This is achieved through two technologies:

- **Dynamic Liveness** is unparalleled in verifying an online user’s identity by ensuring they are the correct individual, a real person (via liveness detection), and are authenticating at that very moment in real-time. This patented, passive facial biometric verification system is ideal for secure enrollment and authentication purposes.
- **Express Liveness** offers a quick, straightforward, and unobtrusive method to confirm that a remote user is indeed the correct person (not an imposter) and a real individual.

iProov’s operations are designed to make online transactions and verification more secure, reliable, and convenient for businesses worldwide. Our solutions are employed across a variety of sectors, particularly where secure and efficient identity verification is critical.

iProov is a Private Limited Company headquartered in London, and maintains additional offices in the USA, Sweden and Singapore.

Our Workforce: iProov is committed to upholding the highest standards of workplace practices, ensuring our workforce remains highly skilled and engaged. The majority of our employees benefit from a flexible hybrid working model, allowing them to fulfil their duties through a combination of in-office and remote work.

Our recruitment process is conducted in-house by talent acquisition specialists, who are thoroughly trained and adhere strictly to relevant employment and labour legislation, this includes:

- Right to work document checks, we utilise a specialist third party verification agency to carry out our criminal and credit checks for all employees.
- Contracts of employment are duly acknowledged and executed by the employee, ensuring that all employees are aware of their contractual and employment rights.
- Ensuring easy accessibility of job descriptions and pertinent documentations for employees, facilitating clarity and understanding of job expectations and responsibilities.

Remuneration is benchmarked annually to ensure adequate competitive rate across the industry. We believe in ensuring our employees are paid fairly and equitably in line with their role and experience. We utilise data to inform our decisions regarding compensation. Therefore, we rely on external benchmarking reports to access the appropriate compensation bands for our roles. Due to the specialised nature of our work and the high skill level of our workforce, we ensure that our employees are compensated above the minimum London living wage, which exceeds the UK National minimum wage.

iProov has a dedicated People team charged with fostering a supportive and positive work environment, in addition to the talent acquisition and reward practices, the team ensures iProov has fair working conditions including; health and safety reviews, holiday entitlement benefits, clear processes to report something that doesn't seem right including whistleblowing, monitoring of engagement and working conditions via regular employee surveys.

Our Supply Chain: In conducting our business operations, iProov utilises a diverse network of reputable suppliers, each undergoing a meticulous supplier onboarding process to ensure that it is free from modern slavery and human trafficking amongst other critical enquiries. We conduct our supplier onboarding in line with our Supplier and Supply Chain Management Policy which adopts a risk based approach to supplier onboarding.

Our approach involves dispatching a supplier self assessment due diligence questionnaires to ensure that requirements are met in line with said policy. We prioritise specialised training for employees engaged with infrastructure critical suppliers to enhance awareness and vigilance.

As an integral part of our onboarding procedure comprehensive legal and compliance checks are executed, which takes into account compliance with relevant employee and labour laws. This underscores our commitment to ethical business practices and the protection of human rights within our supply chain.

iProov's Policies on Modern Slavery and Human Trafficking

Public Disclosure Policy: Our Whistleblowing and Code of Conduct policies ensure that our employees recognise when something is not right and know the process to follow when raising issues of malpractice, ethics and wrongdoing. Our Whistleblowing Policy allows employees to raise concerns without fear of retaliation.

Supplier and Supply Chain Management Policy: iProov acknowledges the diversity and uniqueness of our suppliers, understanding that a universal approach to supplier management may not yield the most efficient outcome. As such, iProov organises its supplier relationships into categorised Supplier Relationship Types, serving as a form of tiering or segmentation to manage each tier based on specific needs. There may be multiple suppliers in each tier therefore we assess our contracts with suppliers along these dimensions to help arrive at the optimal supplier management. This aids in adopting a risk-based approach in line with our Supplier and Supply Chain Management Policy.

Employee Code of Conduct: iProov's Code of Conduct outlines our expectations regarding our employees' behaviour towards their fellow iProovers and the overall Organisation. We have highlighted our key principles and expectations in this policy, it sets out our commitment to ethical practices, respect, and integrity in all facets of our operations.

Employee Handbook: This policy is designed to familiarise employees with iProov's practices, benefits and key contacts. iProov makes it clear to all employees the actions and behaviour expected of them when representing the organisation. iProov strives to maintain the highest standards of employee conduct and ethical behaviour when operating its business. The Employee Handbooks details the consequences for failing to meet these standards, which may include termination.

Training and Capacity Building

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business operations, our People Department is fully aware of the legal requirements of the Act and issues all existing and new employees with this statement.

As part of the onboarding process, all employees are required to review and acknowledge the aforementioned policies amongst others. Certain topics are the subject of mandatory compliance training such as Preventing Workplace Harassment to ensure continual adherence and understanding of these critical areas, we have implemented refresher training for all requisite policies, which is triggered via our training platform tools.

During FYE 2023-24 iProov developed additional compliance training which our employees are required to complete annually, included within our Anti-Bribery training. iProov continues to evaluate the training responsibilities it has as a business and will be reviewing its policies and training, including those relating to modern slavery, in the coming fiscal year to set out improvements and action plans.

Supply Chain Risks and Due Diligence Processes

iProov employs a risk-based approach in the management of its supply chain striving to mitigate the risk associated with modern slavery and human trafficking. Nonetheless, iProov acknowledges that some suppliers may pose a higher potential risk of modern slavery or human trafficking, through the suppliers extended supply chain.

To address these risks, iProov has implemented several measures:

- Ensuring that suppliers adhere to due diligence obligations, including compliance with relevant labour laws.
- Contractual commitments; iProov believes it possesses sufficient protection in our agreements with suppliers. iProov can also, where appropriate, require its suppliers to provide a summary of the steps they take to prevent modern slavery, including details of any relevant policies applicable to their staff and their suppliers.

Further Commitments for FYE 2024 - 2025

1. **Further Awareness and Training:** Raising awareness and offering training on modern slavery and human trafficking risks across iProov by launching a module on our training platform.
2. **Ongoing due diligence:** Conducting ongoing due diligence on our suppliers who pose a higher risk of modern slavery and human trafficking due to location or product offering by developing a criteria to identify this and tailoring supplier self assessment questionnaires to identify such risks.
3. **Policy Review:** Updating the Supplier and Supply Chain Policy to incorporate specific anti- slavery and human trafficking clauses.

These steps reflect iProov's ongoing commitment to ethical practices and the importance of vigilance and proactive measures in combating modern slavery and human trafficking within the supply chain.

At iProov we prize our integrity and champion a culture of individual accountability and doing what's right morally. We continue to foster this in all that we do.

This statement is supported and approved by the board of directors.

Name: Andrew Bud.....

Role: CEO.....

Signed: Andrew Bud.....
Andrew Bud / Apr 17, 2024 11:57:50 UTC

Dated: 17/04/2024.....