



Modern Slavery Statement

2020

Introduction

The UK has some of the most robust anti-slavery legislation in the world. The Modern Slavery Act 2015 gives law enforcement the tools to fight modern slavery, ensures perpetrators can receive suitably severe punishments for these appalling crimes and enhances support and protection for victims.

The act:

- ◆ consolidates and simplify existing offences into a single act
- ◆ ensures that perpetrators receive suitably severe punishments for modern slavery crimes (including life sentences)
- ◆ enhances the court's ability to put restrictions on individuals where it's necessary to protect people from the harm caused by modern slavery offences
- ◆ creates an independent anti-slavery commissioner to improve and better coordinate the response to modern slavery
- ◆ introduces a defence for victims of slavery and trafficking
- ◆ places a duty on the secretary of state to produce statutory guidance on victim identification and victim services
- ◆ enables the secretary of state to make regulations relating to the identification of and support for victims
- ◆ makes provision for independent child trafficking advocates
- ◆ introduces a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
- ◆ enables law enforcement to stop boats where slaves are suspected of being held or trafficked
- ◆ requires businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains

We know that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global and growing issue given the rapid rise in global migration, existing in every region in the world and in every type of economy, whether industrialised, developing or in transition.

GLOBAL-365 PLC has a zero tolerance approach to Modern Slavery of any kind. No sector or industry can be considered immune or untainted and this includes our operations and supply chain. Our staff are expected to report concerns, using the appropriate reporting channels, and our management team is expected to act upon them.

Our business and supply chain

GLOBAL-365 currently only operates in the United Kingdom and as a provider of transaction processing services does not supply any products and therefore does not source any products. Our suppliers only provide services to us and all these services originate in the United Kingdom and are supplied by United Kingdom registered companies.

Policies and contractual control

GLOBAL-365 PLC's internal policies include our Anti-Slavery Policy and our Procurement Policy.

Our Anti-Slavery Policy ensures that in all our relationships with clients, suppliers and third parties they undertake, warrant and represent that neither they nor any of their officers, employees, agents or subcontractors have:

- ◆ committed an offence under the Modern Slavery Act 2015 (a “MSA Offence”)
- ◆ been notified that they are subject to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015
- ◆ become aware of any circumstances within their supply chain that could give rise to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015

In addition they are required to undertake that they will:

- ◆ comply with the Modern Slavery Act 2015;
- ◆ notify GLOBAL-365 PLC promptly in writing if they become aware or have reason to believe that they, or any of their officers, employees, agents or subcontractors have breached or potentially breached any of their obligations under this Clause. Such notice to set out full details of the circumstances concerning the breach or potential breach of the obligations.

Our Procurement Policy requires that all contracts with suppliers include the following wording:

Each party shall perform its obligations under this Agreement in compliance with all relevant and applicable laws, regulations and rules of relevant governing bodies.

Each party shall ensure that it has secured all licenses, permits, registrations or other authorisations that it is required to hold by law or pursuant to any requirements of any relevant regulatory body.

The parties shall work together to ensure that at all times they comply with money laundering requirements.

Without prejudice to this clause each party agrees to use best efforts to comply with any requests made by any relevant regulatory body.

Audit and whistleblowing

As a PLC, GLOBAL-365 is subject to audit by external auditors. GLOBAL-365 PLC’s auditors are CW&R Limited who are registered by The Institute of Chartered Accountants in England & Wales and appear on the Register of Statutory Auditors. The company is therefore audited at least annually for statutory compliance.

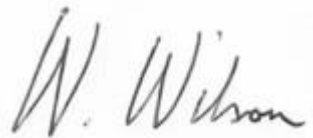
In addition, every member of staff is aware that they can speak directly to the Senior Statutory Auditor at CW&R Limited without first notifying their line manager. They can do so anonymously if they wish.

Modern Slavery training

Risk management is a major topic during Induction training for new staff members and then regularly during refresher training. Slavery is a category of risk in its own right and as such if a potential risk was to be identified it would be entered onto the Risk register and a Risk Assessment and Mitigation form would be completed. Potential slavery risks are dealt with in accordance with the GLOBAL-365 PLC Slavery prevention procedure. In all cases the forms are considered at the next GLOBAL-365 PLC Board meeting.

This statement was approved by the Board of GLOBAL-365 PLC

Signed

A handwritten signature in dark ink, appearing to read 'W. Wilson', is placed over a light gray rectangular background.

William Wilson
Chief Executive Officer
GLOBAL-365 PLC

August 2021