

Modern slavery and human trafficking statement

Modern slavery and human trafficking statement for the financial year ending 31 December 2022.

Introduction

We are committed to improving our practices to combat slavery and human trafficking throughout our organisation and in our supply chain.

Organisational structure

We provide software and services in the convenience retail and petroleum wholesale sectors.

Our global headquarters is in Alpharetta, Atlanta, USA. We have approximately 1,837 employees worldwide and have offices in United States, Canada, New Zealand, Bangkok, India, Malaysia, Australia, Slovakia, United Kingdom, and Germany.

Our business

Our business is organised into three product business units:

- 1) Consumer Engagement
- 2) Enterprise Productivity
- 3) Security

Our supply chains

Our supply chains mainly include contract and licenses of the provision of data and IT services in respect of our core business. As such, our supply chain is largely for the provision of services rather than manufactured goods. Due to the nature of the industry that we operate within, the risks of modern slavery within our supply chains is considered low. Nevertheless, we take modern slavery and human trafficking seriously.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are reviewing our policies in this area to ensure that they reflect our commitment to acting ethically and with integrity in all our businesses.

We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Code of Business Conduct
- Anticorruption Policy; and
- Whistleblowing Policy

We also have in place systems to monitor potential risk areas in our supply chains and protect whistle blowers.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity, or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

We have zero tolerance to slavery and human trafficking. The Organisation does not enter into business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation and in many cases exceeds those minimums in relation to its employees.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation is taking steps to ensure that modern slavery is not taking place. We are reviewing the process of Supplier Screening to include:

- Termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- Reviewing supplier and contract templates to reflect our policies and commitment
- Implementing vendor vetting processes to ensure ethical labour practices and adherence to code of ethics
- Use of credit scoring and compliance monitoring solutions.

Training

To ensure a high level of understanding of the risk of modern slavery and human trafficking in our supply chains and our business, we are implementing training to our staff.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval:

Signed:



Print name:

James A. Francis

Job Title:

CEO

Date:

5/2/2023