



4 Bloomsbury Square London WC1A 2RP

QMULI

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

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Reasons for update:

Various amendments

*Any copy of this Policy provided to non-Qmuli personnel
will be redacted for legal, commercial or personal data protection purposes.*

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MODERN SLAVERY AND HUMAN TRAFFICKING

1. Introduction to this Policy

Qmuli is committed to eliminating acts of modern-day slavery and human trafficking within its business and from within its supply chains.

Qmuli's annual turnover is under £36 million and as such Qmuli is not legally obliged to report on slavery and human trafficking.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015.

This policy includes the following:

- ◆ A summary of Qmuli's organisational structure, business and supply chains
- ◆ Information on this Policy
- ◆ Monitoring compliance within Qmuli and across the supply chain
- ◆ Training and updates
- ◆ Appendices including details of suppliers, checks performed
- ◆ History of policy updates

2. Organisational Structure, Business and Supply Chains

Qmuli provides a range of delivery services, ad production services and also sells its own developed solutions for assisting with the management and production of advertising and marketing materials.

Qmuli is a fully remote working company with all of its staff and regular contractors working from their homes.

Qmuli has some 35 suppliers in total for all its business requirements. These comprise a mixture of small, medium and large companies, with the majority being large international companies such as Microsoft, whose Azure cloud-based service provides the core server infrastructure that underpins Qmuli's system offerings.

3. Policy on Slavery and Human Trafficking

Qmuli is committed to ensuring that there is no modern slavery or human trafficking in any part of its business or in its supply chains. This policy reflects Qmuli's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure that this is the case.



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4. Managing and Monitoring Compliance within Qmuli

Qmuli considers itself to be a 'low risk' business with regard to failing to comply with 'modern slavery and human trafficking' regulations. However, Qmuli fosters a culture that encourages the identification and reporting of any such risks within its business. Qmuli recruits all its employees and regular small contractors either directly or through recruitment agencies who are members of the Recruitment and Employment Confederation. Qmuli does not use agency workers.

Qmuli uses a company called Citation to help ensure Qmuli is updated on necessary requirements and help Qmuli monitor and track its compliance with regard to its staff and regular contractors.

5. Managing and Monitoring Supplier Compliance

Qmuli has a zero tolerance to modern slavery and human trafficking. To ensure that all those in its supply chains comply with its values, Qmuli has implemented a supply chain compliance checking programme. This takes three forms:

Qmuli has a zero tolerance to modern slavery and human trafficking at any point in its supply chain.

If a supplier has a relevant policy available on their website, this is noted in the Qmuli Supplier Compliance log. If it is not the case, Qmuli takes a view as to the likelihood that the supplier might be working in contravention of the current law and seeks assurances in any instances where Qmuli has any doubt.

All new suppliers are flagged by the Head of Finance (Phillipa Lowe) to Marcus Kirby, the director responsible for such matters, who will determine any assurances required.

6. Training & Compliance Requirements Updates

Qmuli uses a company called Citation to provide it with the support necessary to ensure that it keeps all its team updated on this policy whenever it changes. This includes topic-specific email updates, useful information in their client portal, and a range of other documentation and fact sheets.

Citation also provides Qmuli with the ability, within their portal, to upload its own policies and other information, such as employee and contractor rules and guidelines, etc. The Citation portal allows Qmuli to distribute this updated policy each time to the team and asks them to confirm that they have read and understood its contents.

7. Policy Updates

If Qmuli becomes aware of any requirement to update this policy, it will implement the necessary changes to both policy and all accompanying records. If the change is

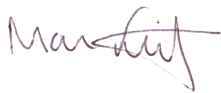
considered sufficient to warrant it, an updated policy document will be released and made available on its website. Qmuli reviews and updates this policy once every two years as a minimum.

Qmuli maintains a full Modern Slavery and Trafficking Policy that includes:

- ◆ This Policy Document
- ◆ Details of suppliers

8. Director Sign Off

This policy is accurate and complete to the best of my knowledge.



Marcus Kirby
Director

Date: 14th February 2023.

Reason for update:
Various amendments

Marcus Kirby is contactable via email to marcus.kirby@qmuli.com.