

Anti-Slavery and Human Trafficking Statement

Financial year ending 30 June 2021

Introduction

The Azuro Group of Companies, (collectively, "Azuro", "we", "us", "our") believes that human trafficking, slavery and related exploitative practices such as slavery, servitude, forced and compulsory labour and child labour ("Modern Slavery") is a crime and a violation of fundamental human rights.

Azuro is a software development and solutions company with many years' experience developing and deploying complex systems and service across several locations including the UK and the USA.

As part of our culture of good governance and good business practice, Azuro is committed to opposing modern slavery and human trafficking in any form and preventing this by whatever means we can. We have zero-tolerance for the exploitation of individuals in any part of our business including our supply chains and any offences covered by the various acts, including the Modern Slavery Act 2015.

Supply Chains

The substantial majority of Azuro's operations are South African based, and we source goods and services from predominantly SA based suppliers, some of whose supply chains extend globally.

Given the nature of Azuro's business (software development and solutions), the majority of supplies tend to be tools and services that enable these activities, which includes hardware on which our developers work and third-party software to enhance our operations. We also procure services that ensure that the premises we own, or utilise, are fully operational.

We continue to assess potential high-risk areas as we recognise that no supply chain can be considered entirely free from the potential for slavery or human trafficking to occur. Where necessary, appropriate action is taken to ensure that we are only working with suppliers who share our zero-tolerance approach to slavery and human trafficking. We expect that our suppliers will hold their own suppliers to the same high standards.

Policy Statement

Azuro prohibits the use of modern slavery and human trafficking in our operations and supply chain and are committed to ensure that modern slavery is not taking place anywhere within our organisation or any of our supply chains.

This policy applies to all persons working for Azuro or on our behalf in any capacity, including team members at all levels, directors, seconded team members, interns, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of our team members' contract of employment, however it is published as part of the internal company policies.

Commitment

Although Azuro considers our risk of modern slavery to be low due to the nature of our supply chains, we take our responsibility to combat modern slavery seriously as demonstrated by our commitment to combat modern slavery and human trafficking.

- ^ We have zero tolerance for slavery and human trafficking in any part of our business, including our supply chain. Our commitment is to respect human rights and demonstrate leadership in responsible workplace practices across our organisation and in all regions where we conduct business.
- ^ We do not enter into business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.
- ^ The prevention, detection and reporting of modern slavery in any part of our company or supply chain is the responsibility of all those working for us or on our behalf.
- ^ Our team must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- ^ We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- ^ Our contracting processes are done on a risk-based approach, and we keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.

Policies and Approach

Managers have an obligation to lead by example and to create an environment in which our team knows they are encouraged to ask questions and raise concerns, and to hold others accountable for acting in accordance with our values. Our team is encouraged to submit complaints on unethical activities.

We have internal policies that demonstrate our commitment to eradicating the risk of modern slavery in our business. These include our Recruitment Policy; Remuneration Philosophy; Working Hours and overtime; Disciplinary Code and Grievance Procedure and our Performance Management structure. These documents are made available to all our team members through our intranet.

Communication and Awareness of this Policy

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide briefings to our directors and team members on a regular basis to ensure that they understand and comply with this policy.

Breaches of this Policy

The breach of this policy by any team member, director or person at the company may lead to disciplinary action being taken in accordance with Azuro's Disciplinary Code. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

We may terminate our relationship with other individuals or organisations working on our behalf if they breach this policy.

All team members will be expected to fully co-operate in any investigation into suspected breaches of this policy or any related processes or procedures.

Associated Legislation

This policy sets out Azuro's expectations and commitments in accordance with the following Acts:

- ^ UK Modern Slavery Act 2014 – Section 54(1)
- ^ Constitution of South Africa
- ^ Basic Conditions of Employment Act 75 of 1997 of South Africa as amended
- ^ Labour Relations Act 66 of 1995 of South Africa as amended
- ^ Employment Equity Act 55 of 1998 of South Africa as amended

Further Steps

We intend to take the following further steps for 2022 and beyond:

- ^ Update our contractual documentation to incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy.
- ^ Make provision in our suppliers' contracts that we reserve the right to terminate any contractual arrangement if there is a breach of this policy.
- ^ Provide briefings to our team members and directors to ensure a high-level understanding of the risks of modern slavery and human trafficking.
- ^ Where appropriate we will include reference to Anti-Slavery and Human Trafficking in our policies.
- ^ Finish and publish our business code of conduct.

Organisational Declaration

This statement and policy is made pursuant to Section 54 of the Modern Slavery Act 2015 and the mentioned associated legislations. This statement and policy is signed and approved by our CEO, Johann Ungerer.

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Johann Ungerer

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Johann Ungerer

CEO

Azuro Group of Companies

30 January 2022

Date