

## Modern Slavery Act 2015 – Annual Statement

### Introduction

This statement sets out Redwood's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2022.

Redwood recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational Structure and Supply chains

Redwood Software operates in business and IT process automation, providing a suite of automation capabilities, global reach and a 24/7 customer success network. Through acquisitions led by Turn/River, today Redwood's solutions include RunMyJobs, ActiveBatch, and JSCAPE's managed file transfer (MFT) platform.

The organisation currently operates in the following countries:

- United States
- United Kingdom
- The Netherlands
- Germany
- Australia

Redwood has business relationships based predominately within Europe and the USA. The software business sector is not considered one most 'at risk' and no Redwood subsidiary company has intricate supply chains (or partnerships) with businesses based in impoverished regions of the world, where labour laws are non-existent or are not enforced.

### Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Modern Slavery Act policy is available to all employees at Redwood and will be reviewed by Redwood's Chief People Officer annually to ensure compliance. All employees and direct contractors are contractually obliged to comply with Redwood's policies, which includes the modern slavery prevention policy.

- **Risk Assessments:** Redwood will conduct effective due diligence with all new suppliers and audit all relevant existing suppliers to ensure that business operations are free from involvement with slavery and human trafficking.
- **Training:** Redwood is in the process of rolling out mandatory e-learning training course for employees involved in HR and the wider supply chain (training is also available to all other employees), which covers:
  - Awareness as to the various forms of modern slavery in which people can be held and exploited;
  - How employees can identify the signs of slavery and human slavery;
  - How employees should respond if they suspect slavery or human trafficking.

## Relevant Policies

Redwood operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can email [Whistleblower@Redwood.com](mailto:Whistleblower@Redwood.com).
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Recruitment policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier.

- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### **Performance Indicators**

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- Requiring all relevant staff to have completed e-learning training on modern slavery by Jan 1<sup>st</sup> 2023.
- Developing a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain.
- Reviewing its existing supply chains, whereby the organisation evaluates all relevant existing suppliers.

### **Approval**

This statement has been approved by the organisation's Chief Operations Officer, who will review and update it annually.

**COO signature:**  **DocuSigned by:**  
Ashish Joshi  
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**Name:** Ashish Joshi

**Date:** 10/6/2022