



Modern Slavery and Human Trafficking Statement 2023



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Version History

Change	Responsible	Approved By	Date	Version
Created document	Legal		02/05/2024	1.0
Approval of Policy		Board/CEO	5/11/2024 4:47 PM CEST	
Ready to Publish				

The Legal department is responsible for the content, communication and continuity of this policy. This policy should be reviewed and approved by the Board of Directors, and signed by the CEO, on an annual basis prior to May 31st.

This joint statement has been prepared on behalf of Outpost24 and its subsidiaries, for the financial year ending December 31, 2023, in accordance with the UK's *Modern Slavery Act 2015* and Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, which came into force on January 1, 2024.

Outpost24 is committed to preventing and combating human trafficking and modern slavery in all its forms. This includes, but is not limited to, the recruitment, employment, or use of individuals subjected to these practices. This policy outlines our commitment to ethical business practices and compliance with legal requirements and international standards. This policy applies to all employees, contractors, suppliers, and business partners globally.

Organizational Structure

The Outpost24 Group helps organizations limit their digital exposure with a complete range of cyber risk management solutions. Outpost24 is headquartered in Sweden and has additional offices in the US, Canada, the UK, the Netherlands, Belgium, Denmark, France, Spain and Vietnam.

Supply Chains

Our main suppliers can be categorized into the following groups:

- **Infrastructure providers:** These suppliers host and ensure the availability, scalability, and security of our SaaS solutions.
- **Service providers:** These suppliers provide software applications and support various business operations.
- **Third-party consultants and contractors:** These suppliers are engaged for various tasks, such as legal counsel and marketing services.
- **Office equipment suppliers.**

Legal Compliance

Outpost24 will comply with all applicable laws and regulations related to anti-slavery and human trafficking.

Code of Conduct

Outpost24 expects our suppliers and business partners to share our commitment to combating modern slavery and human trafficking. Our Code of Conduct guides us and sets expectations for our behavior and decision-making. We rely on our suppliers to monitor their own supply chains. Although we don't insist on written certifications to confirm compliance with modern slavery and human trafficking laws, we reserve the right to terminate our relationship with any individuals or organizations working on our behalf if we suspect violations of relevant laws, or if they fail to comply with this policy.

Risk Assessment and Due Diligence

Outpost24 has conducted a risk assessment to identify areas within our operations and supply chains that may be susceptible to human trafficking and modern slavery. Based on this assessment, we have determined that the likelihood of such risks is low. However, we remain vigilant and will regularly review and update our risk assessment as necessary.

Reporting and Whistleblowing

Outpost24 encourages all employees and stakeholders to report any suspected cases of human trafficking or modern slavery promptly. We have established a confidential reporting mechanism to ensure anonymity and protection against retaliation. Reports can be made via <https://www.safecall.co.uk/en/file-a-report/>. All reports will be thoroughly investigated, and appropriate actions will be taken.

Training and Awareness

Outpost24 is committed to raising awareness among our employees and stakeholders about the signs of human trafficking and modern slavery. Select individuals, including all employees located in the UK and Canada, undergo targeted anti-slavery and human trafficking to ensure they understand their responsibilities and know how to report any concerns or suspicions.

Monitoring and Compliance

Outpost24 will monitor and evaluate our anti-slavery and human trafficking efforts at least annually to ensure compliance with this policy. Internal assessments will be conducted to identify areas for improvement.

Continuous Improvement

Outpost24 will review and update this policy annually to reflect changes in legal requirements and international standards. We will endeavour to stay updated on emerging trends and best practices in the fight against human trafficking and modern slavery.

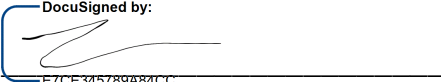
Communication and Engagement

Outpost24 will ensure that this policy is effectively communicated to all employees and made accessible to contractors, suppliers, and business partners. We will engage in dialogue with stakeholders to foster a culture of transparency and continuous improvement in our anti-slavery and human trafficking efforts.

Any questions or concerns regarding this policy should be directed to Outpost24's Legal Department at legal@outpost24.com

Attestation pursuant to section 11 of the Canadian Act

In accordance with the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signature: 

Name: Karl Thedeen

Title: CEO

Date: 5/11/2024 | 4:47 PM CEST