



Modern Slavery and Human Trafficking Statement

This statement is published on behalf of SGO Corporation Limited (“SGO”), pursuant to section 54 of the UK Modern Slavery Act 2015. It constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2020.

Our organization structure

SGO is a UK based Investment/Holding company comprising a series of established and developing ventures the most significant of which is Smartmatic, the world’s leading provider of electronic voting systems which operates through Smartmatic International Holding B.V. and further information about the SGO Group of Companies can be found on our websites www.sgo.com and www.smartmatic.com.

Smartmatic is a professional services business, which predominantly employs professionally qualified and highly skilled people. As a result, the risk of modern slavery within our business is considered low.

Our supply chain consists of goods and services procured to enable our people to deliver these services. Our relationships with sub-contractors, suppliers and their employees, business partners, agents and others working on their behalf (collectively "Third Parties") principally include professional services, manufacturing services and consultancy, human resources, information technology and sales and marketing.

There have been no material changes to our organisational structure and supply chain since our last Slavery and Human Trafficking Statement.

Our Mission

Smartmatic's mission is to increase integrity in the democratic process. We increase citizen engagement and trust, enabling better governments and better societies.

Our policy framework includes a range of policies and guidelines that help define our commitment to the identification and prevention of modern slavery in our business. During 2019, our policy framework was updated to enhance our ability to communicate our policies to our people and other relevant stakeholder. Relevant policies include:

- **Human Rights & Modern Slavery Policy:** makes explicit our commitment to the United Nations Guiding Principles on Business and Human Rights. This Policy confirms our commitment to respect and support international human rights, and in particular to the



International Bill of Rights and the International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work.

- **Diversity and inclusion policy:** encourages all our people to value diversity and respect each person's individuality, and to ensure that no partner, employee, agency worker, contractor, self-employed consultant, job applicant or ex-employee, client or third party receives less favorable treatment on the basis of color, race, nationality, ethnic or national origins, sexuality or gender, disability, age, or religion or belief.
- **Ethics policy:** embodies the key ethical obligations of Smartmatic and our people and is pervasive in everything we do and in all our dealings, whether directly related to the provision of our services or otherwise.
- **Whistleblowing policy:** offers individuals a confidential mechanism for disclosing suspicions or knowledge of possible impropriety to protect the firm, its brands, people and clients by delivering an early warning when something seems to go wrong. This includes matters pertaining to our supply chain which would include modern slavery.
- **Incident reporting policy:** offers individuals a mechanism for reporting breaches of our policies and procedures, and errors, acts or omissions which result in breach of the legal or regulatory obligations of individuals or Smartmatic. All our people have a personal obligation to report such incidents promptly and honestly when identified.
- **Anti-bribery and corruption policy:** setting out our strict rules and what is expected of all our people. We expect the same standards of conduct from our (independent) contractors and third-party service providers in all dealings on our behalf.

Smartmatic is committed to addressing the health and wellbeing of our people and provides access to support, delivered internally and by independent third-party providers that provide free and confidential advice and assistance on matters which include workplace concerns or issues.

Strategy, supply chain due diligence and risk areas

Smartmatic requires its suppliers to adopt the same high standards that we adhere to, and thus have fair employment practices in place. These standards are reflected in our Ethical Code of Conduct with which we expect our suppliers to comply and are built into, and expressly form part of our customers statement of requirements. The Ethical Code of Conduct specifically deals with instances of modern slavery by including, amongst other things, that our suppliers ensure that employment with them is freely chosen, child labor shall not be used, living wages are paid, and working hours are not excessive.

We do not simply buy goods or services on cost-based principles. We operate in emerging as well as developed markets and as such we recognize the areas of potentially higher risk and some services involving relatively high levels of contracted labour. We carry out meaningful consultation with relevant stakeholders to ensure that we exclude the possibility of



involvement in modern slavery in our supply chain . We continue to build on this process to gain further visibility into our supply chain, including by regular review of our data sets. We have a database of our first tier suppliers to maximise control and coordination.

We continue to develop our due diligence, engagement and tracking processes with our suppliers, including in relation to modern slavery and other responsible business conduct issues, such as due regard for diversity and environmental sustainability.

We have identified that the parts of our business and supply chain that carry a potential risk of modern slavery are predominantly those which involve suppliers providing goods and services outside the UK . The steps we are taking to assess and manage these risks are outlined in this statement. We have undertaken and will continue to update such assessments and steps on an annual basis.

Responsible Business

As the principal member of the SGO Group , Smartmatic is committed to contributing to the wellbeing of communities around the world and the Board of SGO have responsibility for ensuring that Smartmatic has the resources and expertise necessary to deliver on that commitment.

Board approval

The SGO Board approved this statement on 2 April 2020 .

David Melville
Company Secretary
On behalf of the Board of SGO Corporation Limited.