



Anti-Slavery and Human Trafficking Statement and Risk Management Plan for the financial year ended 31st December 2023

This statement is published on behalf of SGO Corporation Limited ("SGO"), pursuant to section 54 of the UK Modern Slavery Act 2015. It applies to SGO and all of its subsidiary companies and companies in the SGO Group, including, but not limited to Smartmatic International Holding B.V., AirScape Holdings Limited and Folio Technologies Limited (**SGO Group / we / our**).

Our organisation 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 commitment

We are committed to combatting modern slavery and human trafficking. This statement and risk management plan highlights the key activities which we undertake or are committed to undertake in order to combat the risk of modern slavery and human trafficking, both in our business and our supply chains.

Policies

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 and supply chains. During 2023, our policy framework was updated to effect compliance with recent legal changes and current best practice. 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, gender reassignment, marital or civil partner status, pregnancy or maternity, disability, age, or religion or belief.

- **Ethics policy:** reflects the business practices and principles of behavior that support Smartmatic's commitment to maintain the highest standards of business conduct and ethics.
- **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 staff 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.

Risk Evaluation and Management

We perceive the greatest risk of slavery and human trafficking to lie in our supply chain as managerial responsibility is not directly under our control, but instead lies in the hands of third parties with whom we contract.

To help identify and mitigate the risk of slavery and human trafficking in our organisation and supply chains, we:

- Operate an Ethical Code of Conduct which specifically deals with instances of modern slavery by including, amongst other things, an obligation on our suppliers to ensure that employment with them is freely chosen, child labour shall not be used, living wages are paid and working hours are not excessive.
- Include anti-slavery and human trafficking provisions in all our contracts with suppliers. These provisions require our suppliers to commit to ethical labour practices (including adherence to our Ethical Code of Conduct), and obtain the same commitment from their suppliers;
- Carry out a due diligence process with our suppliers, which is specifically aimed at assessing and mitigating the risk of modern slavery and human trafficking;
- 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 recognise 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 mitigate the possibility of involvement in modern slavery in our supply chains. We continue to build on this process to gain further visibility into our supply chains, including by regular review of our data sets. We have a database of our first-tier suppliers to maximise control and coordination.
- Operate relevant policy documents (see above); and



- Provide effective training to all relevant staff (see below).

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we plan to provide relevant training to our staff, in order that they are able to recognise any signs of human trafficking and slavery and report it where appropriate. We also plan to train all relevant staff on our policies concerning whistleblowing, anti-bribery and equal opportunities.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators to measure how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- **Staff who have been checked for their right to work.** We confirm that all staff have been checked and have the correct right to work documentation in place.
- **The number of reported breaches in the past year.** We confirm that we have not identified or received any reports from our staff, the public, suppliers or law enforcement agencies to indicate that modern slavery or human trafficking practices are taking place in our business or in our supply chains.

Further Risk Management Plans

Following a review of the effectiveness of the steps we have taken in the last year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking: to provide relevant training to our staff as detailed above.

Colin Flannery

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General Counsel

On behalf of the Board of SGO Corporation Limited