

# STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

This statement is published in accordance with the Modern Slavery Act 2015 and defines the principles that have guided Britenet Sp. z o.o. (“the Company”) in 2023 to prevent modern slavery and human trafficking in its operations and supply chains.

## Our obligation in relation to modern slavery

We are committed to preventing slavery, servitude, forced and compulsory labour, abuse of power over vulnerable people, human trafficking, and all other forms of exploitation, as defined in the Modern Slavery Act 2015. Our organisation aims to provide a supportive environment for development and action.

We adhere to the principle of zero tolerance of all forms of modern slavery. We conduct our business relationships with integrity and professional ethics, implementing and enforcing procedures to protect us from engaging with organisations at risk of acts of slavery or human trafficking.

This statement was approved on 30.05.2024 by the Board of Directors of Britenet Sp. z o.o.,

## Our company and its operations

Britenet is a rapidly growing IT company. The headquarters of our company are located in Warsaw. We employ over 1000 employees all over Poland. Our goal is to provide innovative technological solutions that support our customers’ operations and respond to their individual needs.

## Supply chains

Due to the nature of our services, Britenet sp. z o.o. has limited supply chains, reducing the risk of modern slavery and human trafficking. Our supply chains include recruitment, cleaning, and catering services, IT and software suppliers, as well as office and document storage services. We mainly work with small suppliers based in the EU, UK, and US.

Britenet is committed to the highest standards of integrity and transparency in its supply chains so that employees are not subjected to exploitation. We select suppliers selectively and carry out due diligence controls. We also strive to reduce the complexity of supply chains to more easily identify and address weaknesses.

## Effectiveness in combating modern slavery

In 2023, a number of initiatives have been introduced to ensure that slavery and human trafficking does not take place in any part of the company or in any part of its supply chains, including but not limited to the following:

The company has updated the global Britenet Code of Ethics, which defines our values and commitment to international human rights standards and mechanisms for reporting violations. The Code includes:

- Prevention of conflicts of interest
- Protection of company assets
- Prevention of corruption
- Integrity in relations with business partners
- Fair and safe working conditions
- Freedom of speech
- Respect and trust
- Human rights
- Freedom of assembly
- Environmental protection
- Data confidentiality and protection
- Information technology security
- Application of the rules and reporting of abuses

The company has begun developing a Supplier Code of Conduct, which will include provisions based on internationally recognised human rights standards, including human trafficking and child labour. The Supplier Code of Conduct is expected to be approved and published in 2024.

We measure the effectiveness of our actions through regular audits, monitoring reports, and assessing suppliers for compliance with the code of conduct.

**Michał Borny**  
CEO

