

Modern Slavery Statement

Mobysoft Policy

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Overview

The statement sets down the commitment of Mobyssoft Limited to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. All employees are expected to report their concerns and management to act upon them.

Mobyssoft Limited can state that we have no acts of modern-day slavery within our organisation; but we recognise we need to be vigilant and committed to driving out potential acts of modern slavery from our supply chains. We have responsibility under the Modern Slavery Act 2015 to ensure transparency in the provision of all our goods and services.

As part of our due diligence processes to prevent slavery and human trafficking, our:

- Supplier set-up process will require suppliers to outline the controls they have in place. Imported products from sources outside the UK and EU are potentially more at risk for slavery/human trafficking issues
- The Finance & Administration department will continually monitor the level of management control required.
- The Chief Finance Officer will report on this annually (at the end of the year) to our Executive Management Board

We will make reasonable endeavours to ensure employees and workers are not subjected to any form of forced, compulsory or bonded labour in our supply chains. Employees should have freedom to terminate their employment at any time without penalty, giving reasonable notice.

We will not knowingly support or deal with any business involved in slavery or human trafficking.

Our Executive Management Board and Leadership team will take responsibility for implementing this statement and its objectives. They will ensure adequate resources (training and administration etc.) and investment to ensure slavery and human trafficking is not taking place within our organisation or with supply chains.

Modern Slavery Act of Code of Conduct

Whilst working for, or on behalf of Mobysoft Limited, an approved supplier must adhere to the following provisions:

1. Forced or Involuntary Labour

Workers will not be subject to any form of forced labour. All work must be voluntary, and workers shall have freedom to terminate their employment at any time without penalty, given notice of reasonable length.

2. Recruitment Fees

Workers shall not be charged any fees or costs for recruitment, including costs associated with travel, processing official documents and work visas in both home and host countries.

3. Document Retention

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documents (e.g.: passports) is strictly prohibited. The retention of personal documents shall not be used to bind workers to employment or to restrict their freedom of movement.

4. Contracts of Employment

Written contracts of employment shall be provided to migrant workers in a language they understand, clearly indicating their rights and responsibilities about wages, working hours and employment conditions. Migrant workers shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution are strictly prohibited.

5. Deposits

Migrant workers shall not be required to lodge deposits or security payments at any time.

6. Humane Treatment

The workplace shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measure, including mental or physical coercion, or verbal abuse of workers. Nor shall they result in wage deductions, reductions in benefits, or compulsory labour. Threats of physical or sexual violence, harassment, and intimidation against a worker, his or her family, or close associates is strictly prohibited.

7. Workers Equality

All workers shall be treated fairly and equally. Migrant workers shall benefit from conditions of work (including but not limited to wages, benefits and accommodation) no less favourable than those available to country nationals. Migrant workers (or their family members) shall not be threatened with denunciation/disclosure to authorities to coerce them into taking up or maintaining employment.

8. Wages and Benefits

All workers shall be paid at least the minimum wage and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals, directly to workers and shall not be delayed, deferred, or withheld. Only deductions, advances or loans authorised by national law are permitted with the full consent of the worker. Clear and transparent information shall be provided to workers about hours worked, rates of pay and the calculation of legal deductions. All workers must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure or to keep workers tied to their employer or their jobs.

9. Working Hours

Workers shall not be forced to work more than the number of hours permitted in national law. Normal working hours and overtime shall not exceed 48 hours per week. No worker shall be made to work overtime under threat of penalty, dismissal, or denunciation to authorities. No worker shall be forced to work overtime as a disciplinary measure or for failure to meet production quotas.

10. Freedom of Movement and Personal Freedom

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises, nor shall any other coercive means be used to restrict their freedom of movement or personal freedom.

11. Grievance Procedure

An effective procedure shall be established to ensure that any migrant worker, acting individually or with colleagues, can submit a grievance without suffering any prejudice or retaliation of any kind.

12. Private Employment Agencies

Companies shall hire migrant workers directly whenever possible. When the subcontracting of recruitment and hiring is necessary, companies shall ensure their labour agencies are certified or licensed by a competent authority and that they do not engage in fraudulent behaviour placing the worker at risk of forced labour or trafficking for exploitation.

This statement of intent will be reviewed annually or when any legislative or organisational changes are implemented.



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