



MODERN SLAVERY STATEMENT

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes itself in various forms, such as; modern slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Modern slavery is unacceptable within our business and we have a zero-tolerance approach to modern slavery.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, where appropriate, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This statement relates to our activities during the financial year 1 December 2020 to 30 November 2021 and sets out the steps we take to fully understand all modern slavery risks related to our business.

Our business

We are a leading technology company operating predominantly within the Education sector. We offer cloud-based data integration solutions, providing a protective layer for schools to share data with third party applications.

Our sister company, Evouchers, provides tailored digital voucher solutions to organisations in order to support their communities.

We operate our services across 60 countries with offices in the UK and Australia.

Our structure

Our business structure has a range of experience and services which includes (but not limited to) development, technical, sales and international. In order to provide our services at the highest level, we may use third party suppliers in our supply chain for technology services and support / customer services etc.

During the financial year, Wonde operated in the following countries:

- The United Kingdom where Wonde has its key personnel and network infrastructure.
- Australia and New Zealand where Wonde has its subsidiary company Wonde Pty Ltd.

In relation to our supply chain, we conduct regular risk assessments of the different types of supply to identify where any risks may exist within our business of modern slavery. We are low risk of modern slavery and human trafficking due to the nature of the work undertaken and the services we provide.

Organisational policies

This Statement interacts with Wonde's workplace policies and procedures that exist, or are being updated, to identify modern slavery risks and steps taken to prevent slavery and human trafficking in our organisation.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We also have the following policies in place relevant to modern slavery, which we continuously review and update and which reflect our commitment to act with integrity in our business relationships.

These policies include:

- Whistleblowing Policy
- Anti-Bribery Policy
- Employee Policies
- Modern Slavery Policy
- Safeguarding Policy

Responsibility

Our board of directors have collective responsibility for ensuring we comply with our legal and ethical obligations, and that all those under our control comply with it.

Our legal and compliance team has primary and day-to-day responsibility for implementing our internal policies, monitoring their use and effectiveness, dealing with any queries about them, monitoring supply chains and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with our internal policies and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Due diligence

We are establishing a supplier due diligence process to identify any higher risk areas which may arise.

In doing so, we have taken steps to assess and manage risk which includes the following:

- Recognising that the practices of businesses operating within the United Kingdom and the EU will adhere to human rights laws which include the prohibition of slavery and forced labour. Consequently, we strive to continue our business relationship with this in mind.
- We ensure our recruitment processes are in place to vet new employees and workers to ensure they have a legal right to work for us.
- We implement internal policies and procedures on ethical conduct, safeguarding, modern slavery, whistleblowing and bribery.
- Carrying out due diligence when considering our suppliers, partners and business strategies to identify any high risks.
- Onboarding and appraising suppliers.
- We will not enter into any contracts which do not meet the threshold for compliance with relevant legislation and where they do not demonstrate

commitment to ensuring that slavery and human trafficking are not taking place in their own business or supply chains.

- Protect whistleblowers.

We are looking to roll out a supplier code of conduct as the business expands which will include clear requirements on modern slavery.

Plans for the future

We recognise that the business is growing and evolving. As we move forward with our expansion plans, it is integral to our business that a compliance framework remains in place.

As such we intend to do the following:

- Roll out a supplier code of conduct.
- Continue to better understand our supply chains and work towards greater transparency.
- Ensure all contracted suppliers and partners have signed up to and are complying with our terms and conditions which include commitments relating to the Modern Slavery Act 2015.
- Monitor potential risk areas within our core business activities including region risks, country risks and relevant sector risks.
- Protect any whistleblowers that come forward.

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 will provide training to our staff.

Board approval

This Statement was approved on 1 June 2022 by Wonde's Board of Directors.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 November 2021.

Director's signature

A handwritten signature in black ink, appearing to be 'P. Dabrowa', written in a cursive style.

Name: Peter Dabrowa, CEO

Date: 1 June 2022