



CitySwift Anti-Slavery & Human Trafficking

Document Control:

Version ID	Date	Notes
1.0	16 Aug 2019	Policy introduced
1.1	Aug 2020	Policy reviewed and updated
	Aug 2021	Policy reviewed

1.0 INTRODUCTION

CitySwift is a cloud-native, specialist data engine for modern bus networks. Headquartered in Galway, Ireland, CitySwift serves clients mainly in the UK & USA. The board consists of Michael Lynch of Irelandia Aviation, Mike McGearty of CarTrawler and Robert Montgomery, former CEO of Stagecoach. We currently have over 50 employees.

2.0 POLICY STATEMENT

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and in so far as is possible to requiring our clients hold similar ethos. Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

Our slavery and human trafficking policy statement reflects our commitment to acting ethically and with integrity in all our business relationships. In addition to this we operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include our Equal Opportunities Policy, Recruitment Policy, Code of Conduct and Corporate Social Responsibility Policy.

We require any individual or entity acting on our behalf to know, understand, and abide by the laws and regulations applicable to their conduct. This includes employees, agents, partners, and other third-party representatives.

CitySwift's success depends not only on our technical innovations but also on our employees acting ethically. We are committed to complying with the applicable laws, regulations, and rules and to creating a fair and transparent working environment within our business. CitySwift's anti-slavery disclosure reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and

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enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

We are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015.

CitySwift believes that the risks of modern slavery and human trafficking practices within its business are very low. CitySwift is not built upon the type of low skilled labour most vulnerable to such exploitation.

3.0 RESPONSIBILITY FOR THE POLICY

The CitySwift Executive Leadership Team has overall responsibility for ensuring this policy complies with CitySwifts legal and ethical obligations, and that all those under our control comply with it.

The CitySwift Finance Director has primary responsibility for implementing this policy. This includes responsibility for the monitoring of its use and effectiveness, auditing of internal control systems and procedures. The Finance Director is also responsible for updating the policy to reflect any changes in legislation.

Management at all levels of CitySwift are responsible for ensuring those reporting to them understand and comply with this policy, and, are given adequate and regular training on Modern Slavery.

CitySwift employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to your Evolve Representative

4.0 DUE DILIGENCE

CitySwift strives to build supply chains that share our values and demonstrate a commitment to the highest professional standards and ethical conduct in their business dealings.

The nature of our business is such that our material supply chain consists primarily of software subscriptions, technology service providers, professional services, and office supply vendors. Our office services suppliers include, for example, delivery services, cleaning services, office equipment, office furniture and fixtures, office supplies, and related goods. CitySwift does not contract with suppliers in industries where the risks of modern slavery and human trafficking are relatively high. Consequently, we consider our supply chain to be low risk with regards to such relationships and “modern slavery” and do not consider any further action to be necessary to mitigate the risk of “modern slavery” in the supply chain.

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We have not identified any areas requiring action with regard to such relationships beyond our regular procurement due diligence processes, and we are committed to taking all appropriate steps to mitigate the risk of slavery or human trafficking taking place in our supply chain. We periodically review our vendor management procedures with a view to further reinforcing this commitment.

5.0 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 provide training to our staff. This is done through LinkedIn Learning modules & information provided in the employee handbook.

6.0 INTERNAL POLICIES

- Promote compliance with all relevant legislation and stay up to date with recommended guidelines from government
- Ensure employees are carrying out due diligence on clients and suppliers
- Insertion of legal compliance clauses in contracts
- Monitoring performance under such clauses on an ongoing basis
- Align with internal policy & procedures and update annually
- Conduct business in a transparent nature

7.0 COMPLIANCE WITH THIS POLICY

You must ensure that you read, understand and comply with this policy.

All CitySwift employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is. Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.

You must notify your manager OR Function Head as soon as possible if you believe or suspect that a conflict with, or breach of, this policy has occurred, or may occur, in the future. You can also report any suspected breach by following our Whistleblowing Policy.

Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage (see 3.3).

If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any, or all of, the various forms of Modern Slavery outlined in 1.1, follow 3.3.

Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal in accordance with the CitySwift's Conduct policy. We may terminate our relationship with other employees, suppliers and any other associates working with CitySwift if they breach this policy.

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