

Statement on Modern Slavery and Human Trafficking

Ledidi AS and its subsidiaries are committed to social and environmental responsibility and to the fair and humane treatment of its employees and supply chain employees. This statement sets out the steps that Ledidi AS has taken to ensure that slavery and human trafficking are not taking place in any of its supply chain partners or in any part of its own business.

Organisational structure and supply chains

Ledidi's own business operations, including those of subsidiaries, and supply chain consist primarily of office based professionals. Such employees have limited exposure to modern slavery, in contrast to cleaning services and travel and accommodation providers.

Policies

It is our belief that modern slavery and human trafficking are abhorrent practices that will not be tolerated in our own operations or in our supply chains, and we will take reasonable and necessary steps to ensure that none are present. We are committed to working ethically and with integrity, and we require our business partners to do the same.

Ledidi AS has a whistleblowing policy, internally termed Alert Procedure, which refers to requirements for notification of violations of applicable laws and regulations. This includes any suspicion of slavery or human trafficking, and systems have been put into place to make it easy for our employees to disclose any concerns they might have regarding such practices with Ledidi AS. Employees are also encouraged to report any concerns about possible slavery or human trafficking that they might have witnessed outside of Ledidi AS, such as Ledidi's business partners, whether or not the suspicious activity came to their attention during or outside their ordinary working hours.

All notifications on possible misconduct are handled according to the Ledidi's Alert procedure. Ledidi AS ensures to only have business relationships with credible suppliers and vendors with zero tolerance for modern slavery.

Risk assessment and due diligence process

We have assessed the risks, both external and internal, of slavery and human trafficking, including supplier risk, sector risks and business partnership risks within its own operations and supply chain. As of 2022, we don't have high risk business operations in neither high risk geographical areas nor in exposed business sectors.

Where we identify higher risk areas in our supply chains, appropriate due diligence will be undertaken to satisfy ourselves that the parties concerned have in place ethical

employment practices that comply with all relevant legislations, including, where applicable, the making of an Anti-Slavery statement pursuant to the UK Modern Slavery Act 2015. Where suppliers have not published an Anti-Slavery Statement, they are required to confirm that they have in place such ethical employment practices and that they, in turn, require their suppliers to have the same.

Measuring effectiveness

Ledidi's mission is zero tolerance for modern slavery. To measure efficiency, we collect an annual overview of training and notification. The overview includes the number of:

- employees that have completed mandatory training
- reports from our employees that indicate their awareness of and sensitivity to ethical issues
- notifications about suspicion of modern slavery made by our employees

Consequences

In case a breach of this procedure is uncovered in a sub-supplier, the consequences will depend on the facts and severity of the breach including notification of local authorities, termination or other commercial consequences.

The training

Ledidi's employees perform training in all routines and policies that apply in the organisation, including reporting deviations on this procedure.

Follow up

Ledidi will continue to monitor the risk of slavery and human trafficking in its supply chains and its own business, and will act and report accordingly.

Despite the fact that the Modern Slavery Act of 2015 does not apply in Norway, Ledidi AS does its best to comply with the requirements of that law. This statement constitutes the Annual Slavery and Human Trafficking statement for the financial year of **2022**. It has been approved and authorised by the Ledidi's Management Group as part of Ledidi's Internal Control System (LICS).

Approved by Ledidi's Management Group 12.04.2022