# intive

# Anti-slavery Statement for financial year 2023 intive GmbH

## The company

intive GmbH is a global digital powerhouse. We help customers to transform their business by designing and engineering people-centric digital products. We offer comprehensive digital support with more than 1,000 digital natives on board in Poland and Germany. Key operational areas include: Digital Advisory, Design, Engineering, Managed Services. The company's greatest assets are its people – intivers.

The nature of intive's GmbH activity means that the risk of modern slavery within the scope of its business is rather low. Nevertheless, following the introduction of the UK Modern Slavery Act 2015, intive GmbH put in place a "Modern Slavery Policy" to strengthen its existing policies and to prevent modern slavery in any form.

The policy is applicable to all persons working for intive GmbH or on behalf of intive GmbH in any capacity, including employees and solo practitioners (B2B contractors) at all levels, directors, managers, officers, volunteers, interns, as well as external consultants, third-party representatives, agents, intermediaries and other business partners wherever located. All staff members and suppliers must read, understand and comply with the Policy.

We are pleased to announce that in 2023 we have not identified any cases of modern slavery – neither in our company nor in our supply chain. However, it does not make us less vigilant and attentive to any signs or manifestations of modern slavery cases.

#### **Our supply chain**

Our supply chain includes all parties that enable us to conduct our business, from subcontractors to office equipment suppliers. Regarding the prevention of modern slavery, we expect the same high standards from all of our key suppliers, so we promote accountability among them for issues related to modern slavery.

#### **Due diligence**

We have systems in place to identify potential risk areas:

- Before engaging any key supplier, the intiver responsible for particular key supplier's onboarding is obliged to complete a risk assessment with respect to modern slavery.
- Compliance Team and Procurement ensure that specific prohibitions on modern slavery are included in supply documentation. The supplier is obliged to follow the Supplier Code of Conduct.
- Only persons legally able to work (or run business activity) in the relevant locations can be recruited for intive.
- All staff are informed of their statutory rights and any other benefits they may be entitled to.
- In order to reduce the potential risk of modern slavery, HR department engages only recruitment agencies with good reputation.



- If there is any suspicion that the agency may be unreliable with respect to preventing modern slavery, due diligence shall be conducted before engaging this agency.
- Anyone may report any kind of misconduct in an anonymous way, via the *intive speak* up! service, available on intive's website. The investigation will be conducted in a confidential manner. No concerns related to modern slavery were reported in 2023.

### Training

intive GmbH provides trainings on the *"Modern Slavery Policy"* for all intivers as a part of the induction process. Each new employee is informed of his or her responsibility to prevent modern slavery, i.e., to avoid all activities that may be, aid or enable modern slavery.

To ensure compliance with the Supplier Code of Conduct and the "Modern Slavery Policy" and to check the effectiveness of the forced labor prevention system, intive's compliance team conducts an internal risk assessment every year. Its results are presented in the Modern Slavery Statement Register, which lists the areas most at risk.

If non-compliance is identified, the Compliance Team will identify the cause and initiate appropriate corrective action. The effectiveness of our procedures is evidenced by the fact that no cases of forced labor have been identified to date. Each financial year, the Compliance Team reviews this Anti-Slavery Statement to ensure that it is consistent with applicable laws and initiatives at intive GmbH.

#### **Further steps**

We understand that slavery and human trafficking are not static and will continue to occur. As such, we will continue to raise awareness among users, monitor the risks, and take appropriate measures to mitigate them should they occur.

The end of the financial year at intive GmbH is 31st December.

The statement has been approved, and signed by:

DocuSigned by: Viego Rubio 1F02A9DA8B23497

Diego Rubio - CEO

DocuSigned by:

Rob Price 4998E9E48525428

Robert Price - CFO