

Anti-slavery Statement 2020

intive GmbH

intive GmbH is committed to acting ethically and with integrity in all business dealings and relationships and comply in full with all obligations under the UK Modern Slavery Act 2015 ("MSA"). Therefore, the intive "Modern Slavery Policy" has been introduced to express the company's zero-tolerance approach to any form of deprivation of a person's liberty by another person in order to exploit them for personal or commercial gain. intive strictly prohibits modern slavery in all its operations, the supply chain and in any form, including aiding, abetting, counselling or procuring an offence under MSA.

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 end-to-end digital support, having on board over 1000 digital natives in Poland and in 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.

Our supply chain

Our supply chain includes all the parties that make our business operations possible, from sub-contractors to office equipment suppliers. With respect to preventing modern slavery, we expect the same high standards from all our key suppliers thus we promote among them responsibility on the modern slavery issues.

Due diligence

We have systems in place to identify potential risk areas:

- Before engaging any key supplier, 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 incorporating in the supply documentation specific prohibitions against the use of modern slavery. [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 to intive.

- All staff are informed on 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 of a 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.
- All intivers may report any kind of misconduct in an anonymous way, via [intive speak up service](#). The investigation will be conducted in a confidential manner.

Training

intive GmbH provides trainings on the “Modern Slavery Policy” for all intivers as a part of the [induction process](#). Every new joiner is informed about his or her responsibility for preventing modern slavery i.e., avoiding any activities that might be, assist or enable modern slavery.

To ensure the observance of the Supplier Code of Conduct and “Modern Slavery Policy” and check the effectiveness of forced labor prevention system, each year intive’s Compliance Team conducts an internal risk assessment. Its results are presented in the Modern Slavery Statements Register, where the areas of the most significant risk exposure are listed. In case of identifying any non-compliance, the Compliance

Team will recognize the root cause and initiate appropriate corrective actions. The effectiveness of our procedures is demonstrated by the fact that as of now there was no forced labor issue identified. Each financial year, the Compliance Team reviews this Anti-slavery Statement itself, to provide its accordance with the current legislation and initiatives taken at intive GmbH.

Further steps

We understand that slavery and human trafficking is not static and will continue. Thus we will continue to raise awareness among intivers, monitor risk and take appropriate actions to mitigate it, if it only occurs.

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

The statement has been approved and signed of by the Managing Directors – Gurdeep Grewal, Rolf Passel and Rafał Rybkowski, on 30th June 2021.

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Gurdeep Grewal

Gurdeep Grewal – Managing Director

DocuSigned by:

Rafał Rybkowski

Rafał Rybkowski – Managing Director

DocuSigned by:

Rolf Pasel

Rolf Pasel – Managing Director