



## **VOLUNTARY MODERN SLAVERY AND HUMAN TRAFFICKING 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 improving our practices to combat modern slavery in our business by taking steps, as far as we are able, to ensure that our supply chains are free from slavery and human trafficking.

This statement sets out the steps we have taken from 1 December 2022 to 30 November 2023 to understand potential modern slavery risks within our business structure and supply chain, and as well as the steps taken to eradicate these risks.

### **About Us**

Wonde Limited ('**the Company**', '**we**', '**us**' or '**our**') 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.

We also have a voucher solution, Evouchers, which provides a secure, flexible voucher solution which enables organisations to support, reward and motivate service. We operate our services across 60 countries with offices in the UK and Australia.

*Our annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act 2015, we are making this **voluntary statement** to show our commitment to ethical trading principles and to set out the steps we are taking to identify risks and tackle modern slavery and human trafficking in our business and in our supply chains.*

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.

## **Our Structure**

Our business structure has a range of experience and services which includes (but is 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, we operated in the following countries:

- The United Kingdom where we have our key personnel and network infrastructure.
- Australia and New Zealand where we have our subsidiary company Wonde Pty Ltd.

For more information about the Company, please visit our website: [www.wonde.com](http://www.wonde.com).

We are at low risk of modern slavery and human trafficking due to the nature of the work undertaken and the services we provide.

## **Organisational Policies and Training**

This statement interacts with our 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, Anti-Bribery and Corruption and Whistleblowing Policies reflect 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.

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 regular training to our employees.

## **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.
- Ensuring recruitment processes are in place to vet new employees and workers to ensure they have a legal right to work for us.
- Implement, maintain and enforce 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.
- Provide regular training to all employees as set out above, to ensure that they recognise the risks of modern slavery and human trafficking in the supply chain, identify and report potential violations of the organisation's policy, and understand the consequences of failing to ensure that there is no modern slavery and human trafficking in our supply chains.
- 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.
- To protect whistleblowers in accordance with our Whistleblowing Policy.

## **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 which will include clear requirements on modern slavery;
- In relation to our supply chain, to conduct regular risk assessments to identify where any risks of modern slavery may exist within our business;
- Continue to better understand our supply chains and work towards greater transparency;
- Continue to provide regular training to all our employees on annual basis to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, as well as providing training to all new employees as part of their onboarding in to the organisation;
- Ensure, insofar that we are reasonably able to, 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; and
- To continue to protect any whistleblowers that come forward.

## **Board Approval**

This **voluntary slavery and human trafficking statement** is made for the financial year ending 30 November 2023. It was approved by the Company's Board of Directors on 4 April 2024.

Director's signature:

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

Name: **Peter Dabrowa, CEO**

Date: 5 April 2024