

Modern Slavery Statement

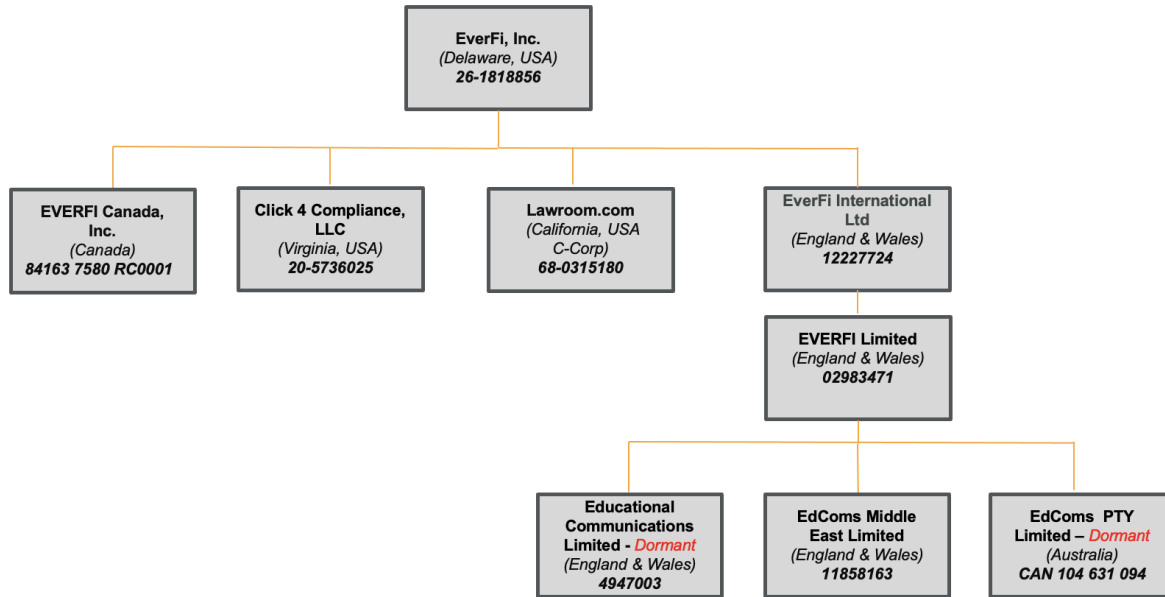
Organisation

This statement applies to EVERFI Limited and EdComs Middle East Ltd T/A EVERFI (referred to in this statement as 'the Organisations'). The information included in the statement refers to the financial year 2020.

Organisational structure



EverFi, Inc. & Subsidiaries Legal Entity Chart 30 April 2021



The labour supplied to the Organisation in pursuance of its operation is carried out in the UK, USA, UAE, Albania and other countries around the globe.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in UK, USA, UAE.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to the provision of educational content, design, digital services, video production, research and data sourcing.

Potential exposure

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted delay, the Organisation remains in a position to publish its statement for the financial year 2019/2020 in line with the original publishing requirements.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'Potential Exposure' above.

The reason the risk did not increase and may have decreased is that the Organisation reduced its reliance on external labour and most of that used was through long-standing relationships with individuals known to us.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

The Organisation took the decision from the outset of the pandemic to ensure that all of the workforce who were required to self-isolate in accordance with public health guidelines continued to receive full pay during their absence.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

All suppliers are thoroughly vetted before being used, including the potential for modern slavery.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 30th April 2021

Signed: *Vicky Coombes*
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Job Title: Finance Director
Date: 30th April 2021