

Modern Slavery Statement

OUR BUSINESS

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019. We oppose slavery and human trafficking in all its forms and make this statement to set out the steps that we have taken to ensure that there is no slavery or human trafficking in our business or in our supply chains.

We Are Very Social Limited (the "Company") is the holding company of companies providing social media marketing services around the world, including in throughout EMEA, APAC and the US. The Company and its UK subsidiary, We Are Social Ltd (together "We Are Social") carry out business in the UK.

OUR SUPPLY CHAINS

Given the nature of We Are Social's business, We Are Social considers that the risk of modern slavery or human trafficking ("Modern Slavery") taking place within its corporate activities is relatively low. Notwithstanding this, We Are Social is committed to ensuring that no Modern Slavery does, in fact, take place within its corporate activities either now or in the future.

Accordingly, We Are Social ensures this through:

OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We Are Social have a number of policies in place including a Modern Slavery Policy and a Whistleblowing policy.

The Whistleblowing Policy can, *inter alia*, be used to report any suspected instance of Modern Slavery either within We Are Social or its supply chain. We Are Social ensures that all reports through its whistleblowing policy are fully investigated and necessary remedial action is taken in the event that any abuse is discovered. We Are Social operates a zero-tolerance policy towards Modern Slavery.

In addition, We Are Social also has a robust recruitment policy which is compliant with all relevant UK laws (including all checks necessary to ensure the right of individuals to work in the UK).

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk We Are Social only aims to use suppliers that adopt the same standards that We Are Social adheres to, including but not limited to its standards on Modern Slavery. We Are Social will require all of its new suppliers to enter into its Code of Conduct, which must be adhered to by the supplier and suppliers within their own supply chains. Furthermore, We Are Social will take steps to identify existing suppliers who have not entered into its Code of Conduct and shall require those suppliers to enter into it. Under the Code of Conduct, which includes a prohibition on Modern Slavery, We Are Social reserves the right to audit its suppliers' compliance and remedial action will be taken in the event that any non-compliance is discovered.

We will continue to monitor potential risk areas in our supply chains on an on-going process to ensure that there is no slavery or human trafficking in our supply chains.

This statement was approved by the board of directors of We Are Very Social Ltd and We Are Social Ltd on 27 March 2019.



We Are Very Social Ltd and We Are Social Ltd