



## Tackling Modern Slavery in Supply Chains

Date: 09.01.2024

iVote DooEL is committed to ethical business practices and ensuring that modern slavery is eradicated from its supply chains. This internal policy document outlines our approach to complying with the requirements set forth in Section 54 of the Modern Slavery Act 2015, as relevant to non-UK suppliers.

As a non-UK supplier, we understand the importance of transparency and accountability in addressing modern slavery. We commit to complying with the requirements outlined in Section 54 of the Modern Slavery Act 2015 and associated guidance.

The following outlines our current initiatives in compliance with the requirements of Section 54 of the Modern Slavery Act 2015.

### **a. Organization's Structure, Business, and Supply Chains:**

We have documented and regularly updated information detailing our organization's structure, business operations, and supply chains. This comprehensive overview ensures transparency and accountability in understanding the complexities of our supply chains.

### **b. Policies in Relation to Slavery and Human Trafficking:**

Our organization has established and published clear policies regarding slavery and human trafficking. These policies are actively communicated and made accessible to all stakeholders, highlighting our commitment to preventing and addressing modern slavery.

#### **Policy Highlights:**

- **Prohibition:** A clear statement prohibiting any form of slavery, human trafficking, or forced labor within our organization and supply chains.
- **Supply Chain Responsibility:** Expectations and requirements for our suppliers to adhere to the same high standards regarding slavery and human trafficking.
- **Reporting Mechanisms:** Established procedures for reporting any concerns or suspicions related to slavery and human trafficking, encouraging a culture of vigilance and responsibility.
- **Investigation and Remediation:** Processes for the prompt investigation of reported concerns and the implementation of corrective actions, including termination of relationships with non-compliant entities.

### **c. Due Diligence Processes:**



We have integrated due diligence processes into our business and supply chain management practices. These processes include risk assessments, supplier evaluations, and ongoing monitoring mechanisms to identify, assess, and mitigate risks related to slavery and human trafficking.

- **Risk Assessments:** Regular risk assessments are conducted across our entire business and supply chain. These assessments are designed to identify potential areas of vulnerability to modern slavery, considering factors such as geographical location, industry sector, and the nature of our operations.
- **Supplier Evaluations:** We rigorously assess and evaluate our suppliers to ensure they share our commitment to ethical practices. Our supplier evaluation process includes a thorough examination of their policies, practices, and adherence to relevant legal requirements regarding slavery and human trafficking.
- **Ongoing Monitoring Mechanisms:** Continuous monitoring is an integral part of our due diligence strategy. We employ various mechanisms, including regular audits, supplier self-assessments, to monitor the adherence of our suppliers to our anti-slavery policies.
- **Identification of Risks:** Our due diligence processes aim to proactively identify areas within our business and supply chains where there is a risk of slavery and human trafficking. This includes assessing risks associated with specific products, services, or regions.
- **Assessment of Risks:** Upon identification of potential risks, we conduct in-depth assessments to understand the nature and extent of the risks. This involves collaboration with relevant stakeholders, including suppliers, to gather information and insights.
- **Mitigation of Risks:** Where risks are identified, we take immediate and effective action to mitigate them. This may involve working closely entities or to implement corrective measures, terminating relationships with non-compliant entities, or seeking alternative sources.

#### **d. Effectiveness Measures:**

We currently measure the effectiveness of our efforts through established performance indicators. Regular assessments help gauge the success of our initiatives in preventing slavery and human trafficking. Identified areas for improvement are addressed promptly to enhance our overall effectiveness.

- **Regular Assessments:** Regular assessments are conducted to evaluate the performance of our initiatives. These assessments involve thorough examinations of relevant data, including supplier evaluations, risk assessment outcomes, and reports of any concerns or incidents related to slavery and human trafficking.

#### **Key Areas of Evaluation:**

- **Supply Chain Transparency:** Assessing the level of transparency within our supply chains, including the traceability of goods and services to their origin.
- **Supplier Compliance:** Evaluating the compliance of our suppliers with our anti-slavery policies and standards.
- **Incident Response:** Measuring the effectiveness and timeliness of our response to any identified incidents or concerns.



#### **Continuous Improvement:**

- Identified areas for improvement are promptly addressed through corrective actions and enhancements to our existing processes. This commitment to continuous improvement ensures that our anti-slavery efforts remain agile and responsive to emerging risks and challenges.

#### **Stakeholder Engagement:**

- We actively engage with stakeholders, including suppliers, employees, and advocacy groups, to gather feedback on the effectiveness of our initiatives. This collaborative approach enables us to refine our strategies and adapt to evolving industry standards and best practices.

#### **Transparency in Reporting:**

- We are committed to transparently reporting on the outcomes of our effectiveness measures. Regular reports are generated, summarizing the results of assessments, highlighting achievements, and outlining steps taken to address any identified shortcomings.

#### **Management Review:**

- Effectiveness measures are subject to periodic reviews at the management level. These reviews ensure that our strategies align with organizational goals, and they provide an opportunity to refine our approach based on evolving risks and compliance requirements.

#### **e. Training and Capacity Building:**

Ongoing training and capacity-building programs are in place to educate and empower our staff and stakeholders on issues related to slavery and human trafficking. These initiatives contribute to building a culture of responsibility and accountability within our organization.

We conduct regular training sessions for all employees, focusing on the awareness and understanding of issues related to slavery and human trafficking. These sessions provide comprehensive information on the signs of exploitation, the impact of modern slavery, and the role each employee plays in its prevention.

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Silvija Gelevski

CEO at iVote

