

Modern Slavery Act 2015

Cooper and Lloyds Modern slavery and human trafficking statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Cooper and Lloyds Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Cooper and Lloyds has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

We are a provider of Database Management as a Service and Support in the IT sector.

Cooper and Lloyds are the leading modern, Digital solutions, managed service and IT support service provider, designed to unleash the power of software and data for developers and the applications we build. Cooper and Lloyds service majorly in UK and Europe.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the country of employment checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Code of business conduct. This code explains the manner in which we behave as an organization and how we expect our employees and suppliers to act.

Our supply chains (Suppliers / Partners)

Our supply chains include: Cooper and Lloyds Ltd operates a supplier and partner policy terms and maintains a preferred supplier or sub- contractors or Partners list. We conduct due diligence on all suppliers or sub-contractors or Partners before allowing them to become a preferred supplier. Our anti-slavery policy forms part of our contract with all suppliers, Partners contractors, sub-contractors and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, partners, sub-contractors, contractors we require that they confirm to us that

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

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.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free on Modern Slavery and Human Trafficking Policy such as Responsible Sourcing Policy • Human Rights Policy • Environmental Policy • Anti-Bribery and Corruption Policy • Whistleblowing Policy • Health and Safety Policy • CSR Policy • Employee Code of Conduct • Supplier Code of Conduct • Recruitment / Agency workers policy [OR] we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

And ensure that Our Modern Slavery and Human Trafficking Policy [OR] our workplace policies and procedures should cover on such as

- a) They have taken steps to eradicate modern slavery within their business
- b) They hold their own suppliers to account over modern slavery
- c) (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- d) (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
- e) We may terminate the contract at any time should any instances of modern slavery come to light)

as demonstrate 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.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk as

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.
- We regularly conduct training for our procurement / sub-contractors /Partners, contractors, our employee lead teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supplychain and delivers to managed services and support services.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

STEPS TO ASSESS AND MANAGE RISKS

Acknowledge the parts of your business and supply chains where there is a risk of slavery/human trafficking taking place, and detail the steps taken to assess and manage that risk.

Training

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 [OR) intend to provide training to our staff. We also require [or) will insists our business partners to provide training to their staff and contractors and suppliers and providers.

Describe broadly in the training that has taken place either directly within the organization, sub- contractors, or with suppliers and others, to better understand and respond to the identified slavery and human trafficking risks.

As to explain in details with training sessions • How to assess the risk of slavery and human trafficking • How to identify the signs of slavery and human trafficking • What initial steps should be taken if slavery or human trafficking is suspected • How to escalate potential slavery or human trafficking issues • What steps the organization should take if suppliers or contractors do not implement antislavery policies in high-risk scenarios

We have a dedicated compliance in-house and outsourced teams, which consists of HR, counsellor and management representatives OR volunteer's involvement teams from the following departments:

- Legal
- Audit and compliance
- Human resources
- Procurement
- Finance and Sales.

The compliance team is led by Sooriyakumar Coimbatore Rajendran.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Employment Procedures

Cooper and Lloyds Ltd has procedures in place pertaining to our employment practices. Robust recruitment processes in line with employment law, including “right to work” document checks, and contracts of employment for all employees.

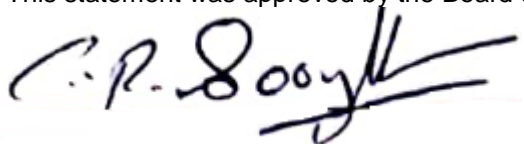
Looking forward

Going forward Cooper and Lloyds Ltd will continue to develop the measures mentioned above in respect of our supply chain. More generally our approach to modern slavery and human trafficking risk will continue to evolve and we will continue to mitigate these risks through the provisions mentioned above during 2020 and beyond.

Cooper and Lloyds Ltd shall take responsibility for this statement and its objectives which will be reviewed and updated as appropriate.

Approval for this statement

This statement was approved by the Board of Directors.

A handwritten signature in black ink, appearing to read 'C. P. Sooryak', with a horizontal line underneath the name.

Sooriyakumar Coimbatore Rajendran

Director