

# Modern Slavery Statement

Tribes (Holdings) Limited  
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United Kingdom  
Company Number: 09292941

## INTRODUCTION

This statement sets out the actions taken by Tribes (Holdings) Limited and relevant affiliates (the Group) to understand the potential modern slavery risks related to its business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its business and the supply chain. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ended 30 September 2018.

## OUR COMMITMENT AND EXPECTATIONS

The Group is committed to combatting modern slavery both within its own business and within its supply chain and will act accordingly if we see any indications of modern slavery in our supply-chain.

We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

## OUR BUSINESS

Tribes (Holdings) Ltd. Group is a technology company within the webhosting-industry with customers mainly in Europe. The services are delivered electronically through the internet. We employ highly skilled and trained personnel.

The group has offices in Europe, Middle-East and Asia.

Suppliers to the group are in the same way mainly based on highly skilled and educated personnel and the supplies are to a large extent service-based and intangible and not labour-intensive.

## **OUR APPROACH TO PREVENTING MODERN SLAVERY**

We have reviewed our existing compliance and risk management processes following the introduction of the Modern Slavery Act in 2015 to determine the suitability of our existing approach, and what further measures may be required to address the risk of slavery and human trafficking taking place in any part of our businesses or in our supply chains.

Following that review, the key aspects of our continued approach to preventing modern slavery can be summarized as follows:

- We have identified major suppliers where we will be investigating their policy on modern slavery and if necessary they will be providing us with further information.
- We comply with all local rules and regulations.
- When possible, we strive to build long lasting relationships with suppliers and we seek to use well-known and renowned brands and companies.
- If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period. We reserve the right to terminate our relationship with individuals and organizations in our supply chain if they breach this policy.

The Group has until today identified zero instances of or indications of the use of modern slavery.

## **TRAINING AND AWARENESS**

- Internally our policy and approach to modern slavery will be integrated in our ethical guidelines and in supplier due diligence when deemed applicable based on a risk assessment.
- Employees are encouraged to raise any concerns about suspected modern slavery associated with the Group or our suppliers and should do this either through their working environment representative, any manager or a member of the board

## **RESPONSIBILITY FOR THE POLICY**

Ultimate responsibility for the prevention of modern slavery rests with the Group's leadership. The Board of Directors has overall responsibility for ensuring the effectiveness of the Group's modern slavery policy and that its implementation comply with legal and ethical obligations.

This Modern Slavery Statement is approved by the Board of Directors of Tribes (Holdings) Limited on March 29, 2019, for and on behalf of relevant affiliates within the Group.

A handwritten signature in black ink, consisting of stylized, overlapping loops and lines, positioned above the printed name.

Signed by Jacob Nordestgaard Jensen  
director

March 29, 2019