Esri UK Slavery and Human Trafficking Statement

This ESRI (UK) Limited ("Esri UK") Slavery and Human Trafficking Statement ("Statement") is made pursuant to the Modern Slavery Act 2015 and is for 01 January 2019 to 31 December 2019 ("Financial Year").

This Statement covers the activities of Esri UK. It sets out the steps Esri UK has taken prior to, or will take during, the Financial Year to ensure that slavery and human trafficking is not taking place in Esri UK or in Esri UK's supply chain.

Esri UK's organisational structure, business and supply chains

Esri UK is a privately owned company which provides Geographic Information Systems and solutions to a wide range of customers. Esri UK's business activities include distributing third party product, computer programming, undertaking professional consultancy services, training and support.

Esri UK is the authorised distributor of Esri Inc. (Environmental Systems Research Institute, Inc., located in California, USA) technology for the market territory of the United Kingdom and Ireland.

Esri UK's supply chain is primarily comprised of organisations within the United Kingdom, and occasionally those based in the USA or Europe. Esri UK's activities are primarily undertaken in the United Kingdom and Ireland, or in Europe. Esri UK does not normally operate outside of these countries.

Esri UK's Policy in relation to slavery and human trafficking

Esri UK Policy in relation to Slavery and Human Trafficking (the "Policy"):

Esri UK does not permit, condone or otherwise accept any form of slavery and/or human trafficking (as defined in the Modern Slavery Act 2015) either by its employees, subcontractors, contractors, agents, partners or any other organisation, entity, body, business or individual with whom Esri UK engages or does business ("Associated Party").

Esri UK is committed to preventing any form of slavery and/or human trafficking in its activities and to ensure that its Associated Parties are free from any form of slavery and/or human trafficking.

In the event that Esri UK suspects any slavery and human trafficking by an Associated Party, Esri UK reserves the right to: report such suspicions, provide appropriate information to the relevant authorities, and to suspend or terminate any associated engagement, business arrangement or contract. Esri UK will take a zero tolerance approach to any slavery and/or human trafficking.

Each Associated Party is required to: put in place suitable management policies / system(s) for ensuring compliance with the Policy; extend the principles set out in this Policy to those engaged or acting on the Associated Party's behalf, including contractors; and to permit Esri UK to audit its compliance with the Policy, including making records available to Esri UK to demonstrate compliance with the Policy.

Esri UK's due diligence processes in relation to slavery and human trafficking in its business and supply chains

In order to ensure that no slavery or human trafficking takes place within its supply chain, Esri UK:

- Has incorporated the Policy into Esri UK's Business Conduct Principles for suppliers, subcontractors and partners ("Business Conduct Principles"). The Business Conduct Principles apply to Esri UK's suppliers, contractors and partners.
- Publishes the Policy on the Esri UK website for public access.
- Publishes its Business Conduct Principles on the Esri UK website.
- Has incorporated the Business Conduct Principles and thereby the Policy into the Esri UK Purchasing Terms. The Esri UK Purchasing Terms apply to Esri UK's suppliers.
- Includes acceptance of the Policy as a pre-condition in its supplier pre-approval process.
- Undertakes any necessary due diligence on organisations within the supply chain to ensure their suitability and ability to comply with the Policy.

Esri UK will ensure that the above continues to apply.

The parts of Esri UK's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps Esri UK has taken to assess and manage that risk

Suppliers and subcontractors: there may be a risk of slavery and/or human trafficking through organisations with whom Esri UK contracts for the supply of products or services, or through organisations with whom Esri UK subcontracts work to or partners with.

The appointment of suppliers and subcontractors is subject to careful due diligence to ensure that there is no perceivable risk of slavery and/or human trafficking. Esri UK engages only with reputable suppliers or parties that do not engage in any form of slavery and/or human trafficking.

All such parties are also expected to adhere to Esri UK's Business Conduct Principles, which is incorporated into the process for being appointed as such and/or the relevant contractual relationship.

Esri UK avoids contracting with suppliers or subcontractors which are located within geographical areas where slavery and/or human trafficking are a risk. In the event that Esri UK contracts with suppliers or subcontractors outside of the United Kingdom, it shall assess the supplier/subcontractor and the relevant geographic area on a case by case basis, undertaking any necessary due diligence in accordance with the paragraph below.

Esri UK does not permit its suppliers to subcontract work or to supply products from any third party, save where Esri UK's prior permission is first obtained. In such situations the supplier is required to undertake adequate due diligence to ensure and to satisfy Esri UK that there is no risk of slavery and/or human trafficking in the third party's supply chain.

Esri UK's ISO, H&S and Security Officer is responsible for any compliance matters set out in this Statement and Policy, for ensuring due diligence and for undertaking audits. The Esri UK HR Team is responsible for ownership of this Statement and Policy, including ensuring that it is up-to-date.

Esri UK's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate

The effectiveness of ensuring that slavery and human trafficking is not taking place in Esri UK's business or supply chains shall be assessed by application of the following key performance indicators:

- To raise awareness of slavery and human trafficking by bringing the contents of the Statement and Policy to the attention of its staff, including by publishing it under 'Company Policies' on our internal portal and providing a formal notice to it on the internal portal home page. [Date required: continuous.]
- Require all staff that are to work in countries where slavery and human trafficking is a risk to complete specific and tailored (to the country in question) training on preventing slavery and human trafficking. [Date required: as and when applicable.]
- Require staff (HR Team) that induct new employees to introduce employees to the Statement and Policy. [Date required: ongoing throughout the Financial Year.]
- Provide training / guidance (Legal Team) to all employees on preventing slavery and human trafficking as part of staff training. [Date required: to commence by April 2019.]
- Continue to ensure that supplier adherence to the Esri UK Policy and the Business Conduct Principles is part of Esri UK's supplier appointment process. All suppliers must adhere to this prior to becoming a supplier.
- Review all existing supply chains. [Date required: annually.]
- Publish historic copies of the Statement and Policy on the Esri UK website. [Date required: April 2019.]

Esri UK training about slavery and human trafficking available to its staff

Visibility of the Statement and Policy on the internal staff portal.

Communication to staff to read the Statement and Policy; and the new training.

Annual reminder to ensure that staff are familiar with the Statement and Policy.

New staff to be introduced to slavery and human trafficking as part of their induction. Extend training to all staff (not just new staff).

Specific training to be provided to any staff who are required to work in countries where slavery and human trafficking is deemed to be a significant risk.

This statement has been approved by the Esri UK board of directors on 09 January 2019.

Signed Stuart Bonthrone, Managing Director

Dated 09 January 2019