

## data.ai Anti-slavery and Human Trafficking Policy

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**Policy Owner:** Legal Department

**This Policy Applies To:** data.ai Personnel

**Questions:** [legal@data.ai](mailto:legal@data.ai)

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## Document Information

<b>Document owner</b>	Legal Department
<b>Approvers</b>	Chief Legal Officer (CLO) Deputy General Counsel, Global Compliance & Privacy (DGC-GCP)

## Revision History

Date	Version	Author	Comments	Approved for distribution
N/A	1.0	DRAFT	DRAFT	N/A
N/A	1.1	DRAFT	DRAFT	N/A
Aug 10, 2022	2.0	Legal	Various: correcting contacts; clarifying scope and details; applying consistency in definitions	Yes
May 30, 2023	2.1	Legal	Update to align with the new policy template and annual revision	Yes

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# data.ai Anti-slavery and Human Trafficking Policy

## Purpose

This Policy serves to express data.ai's unwavering commitment to fighting modern slavery (which includes human trafficking, as defined in the "**Policy**" section below) and outlines our approach towards achieving this goal. The specific measures taken by data.ai on an annual basis to implement this Policy are recorded in our Anti-Slavery and Human Trafficking Statement, which is published in accordance with the requirements of the [Modern Slavery Act 2015](#).

## Scope

This Policy applies to all data.ai Personnel and the leadership team at data.ai. We expect all members of our procurement team and those involved in supplier due diligence/relationship to read, understand, and comply with this Policy, as well as to raise any concerns they may have with their manager, People Partner, or other members of the People team or Legal and Compliance groups about any suspicion of modern slavery in any part of our business or supply chains at the earliest opportunity.

At data.ai, we encourage openness and fully support anyone who reports genuine concerns of modern slavery occurring in any part of our business or supply chains, even if those concerns ultimately turn out to be unfounded. Furthermore, this Policy reflects our expectations of our contractors, suppliers, and other business partners.

## Definitions

The following defined terms apply in this Policy:

**"data.ai "** means data.ai Europe Limited (formerly App Annie Europe Limited; App Annie Europe Limited changed its name to data.ai Europe Limited on February 15, 2022).

**"The data.ai Group"** means data.ai and its corporate affiliates.

**"data.ai 's Management Team"** means data.ai 's Directors, along with data.ai's People Partner, the most senior member of the data.ai Group's Procurement group, and the representatives of the data.ai Group Legal and Compliance team.

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“data.ai 's People Partner” means the most senior member of data.ai HR team (aka “People team”).

## Policy

“Modern slavery” is a fundamental violation of basic human rights and a crime. It takes various forms, including slavery, servitude, forced or compulsory labor, and human trafficking. These offenses are closely related but legally distinct:

- slavery is where ownership is exercised over a person;
- servitude involves the obligation to provide services imposed by coercion;
- forced or compulsory labour involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself or herself voluntarily; and
- human trafficking involves arranging or facilitating the travel of another with a view to exploiting them.

In all cases, some of the most vulnerable people in society are stripped of their dignity and basic freedoms and forced to work for someone else’s gain or benefit. The most common forms of modern slavery are sexual exploitation, labour exploitation including child labour and domestic servitude.

data.ai is committed to taking steps to ensure that modern slavery is not taking place:

- in any part of its own business; and
- in any of its supply chains.

At data.ai, we expect our leadership team and all personnel to work collaboratively to maintain these standards and to conduct their personal and domestic affairs in a way that ensures they are not connected with modern slavery. This includes refraining from committing any criminal offense and avoiding actions or omissions that may bring themselves or data.ai into disrepute. We hold our contractors, suppliers, and other business partners to the same standards and will ensure, where reasonably practicable, that they are contractually obligated or have otherwise agreed in connection with working with us to comply with the spirit and intention of this Policy in their businesses and supply chains to support the general eradication of modern slavery.

To assess and review the risk of modern slavery occurring in any part of our business and supply chains, we will periodically carry out risk assessments and may seek specific reassurances from our contractors, suppliers, and other business partners. We may also

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conduct due diligence or detailed audits ourselves or through third parties to satisfy ourselves that modern slavery is not occurring.

data.ai is committed to transparency in our approach to tackling modern slavery, consistent with our disclosure obligations under section 54 of the Modern Slavery Act 2015 which must be filed each year.

## Reporting Responsibility

data.ai's Management Team is responsible for this Policy and ensuring that it meets our legal and ethical obligations. All data.ai personnel are accountable for following the Policy to the extent that it affects their daily work, especially regarding reporting requirements.

data.ai welcomes any questions or comments regarding this Policy and suggestions on how we can improve procedures to eradicate modern slavery. We are committed to continuous improvement, and your feedback is essential to achieving our goal of eradicating modern slavery from our business and supply chains.

## Sanctions

Any breach of this Policy by any data.ai personnel, including regarding their duties for data.ai or their personal and domestic affairs, may be dealt with under data.ai 's disciplinary procedures and could result in dismissal.

(a) If data.ai has a reasonable belief that modern slavery is occurring in any part of its business:

(i) data.ai will:

- A. Put in place remedial action as soon as reasonably practical with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded; and
- B. Monitor the effectiveness of the remedial action taken, including the steps taken to safeguard the victims;

(ii) data.ai may, depending on the facts, deal with the matter under its disciplinary procedures, which could result in the dismissal of any data.ai personnel found to be responsible.

(b) If data.ai has a reasonable belief that modern slavery is occurring in the business or supply chains of any contractors, suppliers, and other business partners, data.ai:

(i) Will expect the relevant contractor, supplier, or other business partners:

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- a. To be fully transparent and supply such information as data.ai may reasonably request in relation to the issue;
  - b. To put in place remedial action as soon as reasonably practical with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded;
  - c. To monitor the effectiveness of the remedial action taken, including the steps taken to safeguard the victims; and
  - d. Report to data.ai at reasonable intervals on the effectiveness of that remedial action and safeguarding and any further steps to ensure that such modern slavery ceases.
- (ii) Depending on the facts and terms of the contract with the relevant contractor, supplier or other business partners, data.ai may terminate or suspend the relationship or otherwise cease, reduce, or minimize business contact with the appropriate contractor, supplier, or other business partners.

## Training

To ensure that all data.ai personnel who are most likely to implement the steps taken by data.ai in compliance with this Policy have a high level of understanding of modern slavery and the influence data.ai can bring to eradicate it, we provide them with specific training. Our training program is designed to raise awareness of the nature of modern slavery and ensure that it does not occur within any part of our own business or supply chains.

data.ai also encourages (as applicable based on their local jurisdiction/laws and services sector they are in) our contractors, suppliers, and other business partners to provide similar training to their personnel to maintain consistency and ensure that all parties involved understand and uphold the principles of this Policy. We believe that training is crucial in creating a culture of awareness and vigilance to prevent modern slavery.

## Amendments to the Policy

The Policy expresses the will of data.ai and its commitment to the issues addressed. However, it does not create any contractual obligations and may be amended by data.ai at its discretion at any time. The Policy will be reviewed by data.ai's Legal and Compliance groups regularly, usually at the same time as data.ai's Management Team reviews data.ai's annual Anti-Slavery and Human Trafficking Statement.

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## Consequences of Non-Compliance with This Policy

Any non-compliance with or breach of the Policy may lead to investigation and action in line with the data.ai disciplinary processes, including but not limited to termination of employment or service relationship.

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