



Public

data.ai Europe Limited

Slavery and Human Trafficking Statement for FY 2023

1. Financial year

This slavery and human trafficking statement relates to the company's financial year beginning 1 January 2023 and ending 31 December 2023 ("FY 2023").

2. Introduction

data.ai Europe Limited ("data.ai") is the global leader in providing mobile market estimates through its on demand SaaS platform, amongst its other products and services. We are committed to a programme of continuous improvement in our practices to combat slavery and human trafficking in our supply chains and in our business. It is our policy to conduct all business ethically and in accordance with the UK Government's Modern Slavery Strategy, as amended from time to time, and as outlined in the UK Home Office Guidance "Transparency in Supply Chains: a Practical Guide".

We are committed to acting ethically in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter slavery and human trafficking.

We will uphold all laws relevant to countering slavery and human trafficking in all the jurisdictions in which we operate. We understand that we are covered by the UK Modern Slavery Act 2015 because:

- (a) we are a body corporate;
- (b) carrying on business or a part of its business in the UK;
- (c) which supplies goods or services; and
- (d) has a turnover of over £36 million per year.

3. Organisational structure and supply chains

We are a part of the data.ai group. data.ai Europe Limited is a wholly owned subsidiary of App Annie Limited (Hong Kong) which in turn is a wholly owned subsidiary of data.ai inc. (in the United States). data.ai Europe Limited has two subsidiaries, App Annie SAS (in France) and App Annie GmbH (in Germany).



Public

data.ai Europe Limited provides app market, advertising analytics and data science driven insights to mobile publishers and brands. Our main suppliers are:

- (a) software companies (international, mostly Europe and US);
- (b) IT infrastructure suppliers (international);
- (c) facilities suppliers; and
- (d) ancillary administrative services (Legal, Professional consultancy etc).

Our supply chains include: Software Companies, Couriers, Catering products and services, Insurance services, food & beverages, consultancy services, audio/visual equipment services, IT equipment/software and hardware, maintenance services, professional services, recruitment services, security services, utilities, and supplies for our offices.

4. Our commitment to combatting modern slavery and human trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and we are committed to:

- Acting ethically and with integrity in all our business dealings and relationships
- To implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains
- To improving our practices to combat slavery and human trafficking
- To ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Policies, processes and procedures

The following policies, processes and procedures are available to all employees via our intranet:

- Code of conduct
- Recruitment procedure
- Whistleblowing policy
- Procurement procedure



Public

Through these policies and the measures mentioned, we can increase awareness of human rights risks and how they can be identified and addressed. We procure in accordance with the principles of fairness and transparency and our purchasing contract templates reflect modern slavery. Employees are aware of how to report incidents of concern and are encouraged to do so. They can do this through their managers or through the Whistleblowing procedure. Employees are recruited lawfully following clearly communicated procedures and right to work checks are carried out to ensure that individuals have the right to work in the UK. Only reputable recruitment agencies are used for temporary staff and are subject to our procurement process prior to engagement.

5. Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we outline due diligence procedures or other relevant steps taken, e.g., investigating supply chains through various tiers; speaking to suppliers; and asking them to sign up to warranties.

As part of our initiative to identify and mitigate risk we have procedures 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 whistleblowers.

6. 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 vendor compliance programme in relation to evaluating them for anti-slavery and trafficking compliance. We have a dedicated compliance team, which consists of representatives from Legal, Procurement, Finance and Marketing.

7. Effectiveness

- 7.1 It is too early to say with any certainty how effective the steps we are taking have been and will be in ensuring that slavery and human trafficking is not taking place in our business or supply chains. As part of our work for the next financial year we will be considering how best to monitor the effectiveness of the actions taken.



Public

8. Training

8.1 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 training to:

- (a) Members of the data.ai Europe Limited Board of Directors
- (b) Applicable members of the data.ai Europe Limited People team
- (c) Members of data.ai Procurement group

We have various training modules available to all employees via our eLearning platform including compliance-based modules. Employees are also required to read key policies and procedures as part of our documented induction process. Customer-facing employees have additional training, some of which is externally accredited. Specific Anti-Modern Slavery and Human Trafficking training has been accessible via our eLearning platform by request for some employees; however, we recognise that to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, that we need to make this available to all and increase awareness. To this end we will make Anti-Slavery training one of the mandatory courses for all staff during the coming year (April 2023-March 2024). This will be reviewed in March 2024.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of data.ai Europe Limited and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2023.

Signed:

DocuSigned by:

 154C0676B2C04BB...

Name Mithun Zalpuri

Title Sr Director finance Ops

DATA.AI EUROPE LIMITED

Date: 7/16/2024