Modern Slavery and Human Trafficking Statement

Alula Technologies

Financial Year. 2024/25

- Introduction: Alula Technologies is committed to preventing modern slavery and human trafficking in all areas of our business operations and supply chains. We recognise our responsibility to take a proactive approach in identifying and addressing risks associated with forced labour, child labour, and exploitation.
- 2. Our Business and Structure: Alula Technologies is a technology group incorporated in the United Kingdom. Alula Technologies offers proprietary software solutions to the insurance, employee benefits, and healthcare industries. Alula is an integrator, aggregator and supplier of data and software solutions to customers and partners in these industries globally. We employ approximately 90 employees and work with a network of suppliers based in a number of countries.
- 3. Our Policies on Modern Slavery: We have implemented the following policies to ensure compliance with the Modern Slavery Act 2015:
 - Anti-Slavery and Human Trafficking Policy outlines our zero-tolerance approach.
 - Supplier Code of Conduct requires all suppliers to adhere to ethical labour practices.
 - Whistleblowing Policy allows employees and third parties to report concerns confidentially.
- 4. Due Diligence and Risk Assessment: To identify and mitigate modern slavery risks, we:
 - Conduct risk assessments of our supply chain to identify high-risk sectors.
 - Require contractual obligations for suppliers to comply with anti-slavery laws.
 - Perform supplier audits and monitoring where necessary.
- 5. Training and Awareness: We provide modern slavery awareness training to employees, particularly those involved in procurement, recruitment, and supply chain management. This ensures they can recognise signs of exploitation and take appropriate action.
- 6. Measuring Effectiveness: To assess our effectiveness in preventing modern slavery, we monitor.
 - Reports from our whistleblowing mechanism.
 - Compliance levels within our supplier audits.
 - Number of employees trained on modern slavery awareness.
- 7. Approval and Publication: This statement has been approved by the Board of Directors and is published in accordance with the Modern Slavery Act 2015. It will be reviewed annually.

Lee Kuyper Group Chief Executive Officer Alula Technologies March 2025