

# **Modern Slavery and Human Trafficking Policy Statement**



# Document Control

## Responsibilities:

Role	Responsibility
GRC	Owner, Reviewer
Director	Approver

## Review and Approval:

Version	Date	Location	Summary
1.0	30/06/2016	SharePoint Company Policies	Initial Issue
1.1	30/07/2016	SharePoint Company Policies	Updated, Approved
1.1	05/01/2018	SharePoint Company Policies	Approved
1.2	23/03/2018	SharePoint Company Policies	Updated, Approved
1.2	04/01/2019	SharePoint Company Policies	Approved
1.2	03/01/2020	SharePoint Company Policies	Approved
1.3	03/04/2020	SharePoint Company Polices	Updated, Approved
1.3	08/01/2021	SharePoint Company Policies	Approved
1.4	04/05/2021	SharePoint Company Policies	Rebrand, Approved
1.5	16/06/2021	SharePoint Company Policies	Updated, Approved
1.5	07/01/2022	SharePoint Company Policies	Approved
1.6	31/12/2023	SharePoint Company Policies	Updated, Approved



# Modern Slavery and Human Trafficking Policy Statement

## For accounts ending 31 December 2023

We are committed to eliminating acts of modern-day slavery and human trafficking within our business and from within our supply chains. Although we have no legal obligation to report on slavery and human trafficking, this statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and is produced accordingly as soon as possible after the relevant year-end.

### Organisational Structure, Business and Supply Chains

We are a global provider of cloud-based spend management solutions. Founded in 2001, Medius is owned by the global investment firm Marlin Equity Partners. In 2019 Medius acquired the UK entity Wax Digital. The group has offices in Sweden (HQ), the United States, the United Kingdom, Australia, Denmark, Norway, the Netherlands France, Tunisia and Poland. Our supply chains are all wholesale or retail suppliers of infrastructure, equipment, labour and materials relating to software production and office administration.

### Policy on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chains.

### Due Diligence

Although we consider ourselves to be a 'low risk' business with regard to slavery and human trafficking, we foster a culture that encourages the identification and reporting of any such risks within our business.

### Assessing and Managing Risk

As part of our efforts to identify and mitigate risks within our supply chain, we operate systems to identify, assess and monitor risk areas.

### Effectiveness in Combating Slavery and Human Trafficking

We have zero tolerance to slavery and human trafficking. To ensure that all those in our supply chains comply with our values, we are putting in place a supply chain compliance program.

### Training

We provide appropriate training to ensure that relevant employees understand the risks of modern slavery and human trafficking within our business and supply chains.

