



## Awin's Anti-Slavery & Human Trafficking Statement

Date: 2021

### *Introduction*

At AWIN Ltd ("Awin"), we take seriously our role and responsibility in the protection of fundamental human rights and we are committed to ensuring that modern slavery or human trafficking is not taking place within our business or supply chains. We have a zero-tolerance approach to any form of slavery and we are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### *Our Business*

Awin is a market-leading affiliate marketing network connecting 6,000 advertisers to 100,000 publishers. We are wholly owned by AWIN AG, based in Berlin, Germany and form part of the Awin Group which has a presence in 15 locations and 1100 employees worldwide. We have one wholly owned subsidiary (Awin Inc.), which operates in Baltimore, USA. Awin is governed by a Board of Directors, made up of the AWIN AG Executive Team, Adam Ross (Chief Executive Officer), Peter Loveday (Chief Technical Officer) and Virpy Richter (Chief Financial Officer).

### *Our Approach*

As an online business, with a relatively short supply chain, given we operate as the agent between the advertisers and the publishers, we assess the risk of modern slavery within our company to be low. However, we are committed to acting with integrity and transparency and to ensuring that it does not take place anywhere within our business and supply chains and have a zero-tolerance approach towards any instances of modern slavery, including any form of slavery, servitude, human trafficking or compulsory labour. Staff are expected to report concerns using appropriate reporting channels and management are expected to act upon them. All reports will be investigated and appropriate remedial action taken.

We expect all our contractors, suppliers and other business partners to adopt the same high standards we do to prevent modern slavery, by ensuring all employees and workers are treated with respect and dignity in an ethical and fair environment. Our procurement process has been updated to include a requirement for all suppliers to sign a declaration confirming their compliance with the Modern Slavery Act 2015 (the "Act") and our policy and to contract on terms which ensure that we can check their adherence to these principles and, where appropriate, take corrective action. This year we have realigned our internal processes and teams to ensure we are managing our Modern Slavery commitment in the best and most efficient way possible and we are reconfirming the adherence of all our suppliers and putting in process.

We take pride in offering our employees a safe and inclusive environment, ensuring that all members of our team are treated with respect and dignity. We have a number of internal policies which help reinforce this, including our Code of Mutual Respect, and our Code of Conduct, which make clear our expectations and standards and establishes mutual respect as a core value in the global organisation. We strive to ensure that all recruitment practices are upheld in a fair and ethical way, and all applicants are given equal opportunity in their recruitment process. We have an established Disciplinary Procedure and a Grievance Procedure in place to address any issues that may arise.



Our Human Resources Department will be responsible for reviewing and assessing our commitments under this statement and will be working with our Senior Management Team to ensure that we continue to meet these expectations.

This statement is made pursuant to Section 54 (Part 6) of the Act.

A handwritten signature in black ink, appearing to read "Ian Charlesworth".

Ian Charlesworth  
Director

A handwritten signature in black ink, appearing to read "Adam Ross".

Adam Ross  
Company Director