# FYFEWEB LTD MODERN SLAVERY STATEMENT ("STATEMENT")

This is the modern slavery statement of FyfeWeb Ltd ("Company"), including parents, affiliates, subsidiaries, and other companies under common control and ownership. ("Group"). The Company & Group are committed to ensuring that all business dealings are carried out in full compliance with relevant laws and, in doing so, endorse the implementation and promotion of ethical business practices to protect workers from being exploited and abused.

## 1.0 - INTRODUCTION FROM THE BOARD OF DIRECTORS OF THE COMPANY

The Board of Directors of the Company ("Board") is responsible for the establishment and oversight of the Group's business strategy and priorities, its high-level decisions, policies, overall management and accountability to customers, suppliers, employees and shareholders for the financial and operational performance of the Group.

The Board is responsible for monitoring of Senior & Executive Management and conduct of the Company's operations, for making critical business decisions and for building long-term business value. The Board, through approving and monitoring the Company's risk appetite, and identifying and guarding against both the short- and long-term threats to the business, ensuring that the Company manages risk effectively and much more.

As a result of our commitment to doing the right thing, we are firmly committed to eliminate slavery and human trafficking as well as improving the practices to combat slavery and human trafficking throughout the Company as well as the industry in which we work.

#### 2.0 - COMPANY STRUCTURE & OPERATIONS

FyfeWeb Ltd is a company incorporated in England & Wales. It is the ultimate parent company to the Group. The Group is owned and operated by its founders and original Board of Directors.

The Company is a global provider of website hosting, domain name services, cloud services, communications & connectivity, data centre services and consultancy & professional services.

### 3.0 - SUPPLY CHAINS

Our supply chains include a network of suppliers from across the globe. Where possible, we build long standing relationships with local companies and suppliers and we make clear our expectations of business behaviour. This is managed through the use of supplier codes of conduct as well as other best practices.

## 4.0 - OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

In light of the industry in which we operate, we consider that there is a very low risk that modern slavery and human trafficking may affect our business. Nonetheless, we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our businesses. Our Modern Slavery 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 in our supply chains.

# 5.0 - DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, we have in place systems to: (a) Identify and assess potential risk areas in our supply chains; (b) mitigate the risk of slavery and human trafficking

occurring in our supply chains; and (c) protect whistleblowers. These systems receive input/oversight from several different departments in the Company, including Legal & Compliance (incl. Audit Division) Procurement and Human Resources.

#### 6.0 - TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we regularly circulate and share our Modern Slavery and Human Trafficking Statement and Policy with those internal and external to the Company where appropriate.

#### 7.0 - FURTHER STEPS

In order to ensure the effectiveness of the Company's Modern Slavery and Human Trafficking Policy, and to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking: (a) Make suppliers and service providers aware we promote the requirements of the legislation; (b) Ensure suppliers support the Company's principals as set out in this Modern Slavery and Human Trafficking Statement and Policy, and that they comply with all applicable legislation and regulatory requirements.

This statement is made voluntarily pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's modern slavery statement.

Signed:

Connor McDonald, Operations Director FyfeWeb Ltd & Group

Date: \_\_\_\_2022-03-01