UK Modern Slavery Act Statement

SummitAI UK Modern Slavery Act Statement

Foreword

This statement is made by SummitAI LLC under Section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Managers. This constitutes our Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2024.

We are committed to the highest standards of ethical and governance arrangements in respect of impartiality, integrity and objectivity in all our activities, and we are committed to upholding human rights and ensuring that our operations do not contribute to any form of modern slavery or human trafficking, to which we have a zero-tolerance approach.

Modern slavery is a global issue, and we are committed to doing our part to address it. We aim to ensure that the company is not engaging in or contributing to modern slavery practices in any part of its operations or supply chain, and we have a firm commitment to combating modern slavery in all its forms, including forced labour, human trafficking, and all other types of human exploitation.

Our policies reflect best-practice guidance issued by HM Government. We provide awareness training to all our colleagues involved in the procurement processon the Modern Slavery Act, and make suitable resources available to enable them to take appropriate action if they suspect a case of slavery or human trafficking in our supply chain.

We complete our own risk assessments and work with our suppliers to help them better understand the anti-slavery activity they should be undertaking. We are committed to maintaining best practice and to seeking continuous improvement. We invite you to help, share best practice, and to hold us to account and challenge where you think we can do better (**compliance@summitai.com**).

Paul Luongo

Chief Legal Officer

1 April 2024

Our business

SummitAI is building the leading enterprise AI company for digital transformation across the most critical and resilient growth verticals, including retail, consumer packaged goods, finance, manufacturing, media, and IT service management. SummitAI verticals have many leading enterprises as clients.

We engage with a range of suppliers from SMEs to large corporations, many of which are UK based, and we consider ourselves to have a generally low risk of modern slavery in our business activity.

Our commitments

SummitAI is committed to protecting and respecting human rights and has a zero-tolerance approach towards modern slavery and human trafficking. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. We do not enter into

business with any organisation which knowingly supports, or is involved in, slavery, servitude, trafficking, or forced or compulsory labour.

Our Policies

We are committed to doing the right thing by ensuring we respect human rights and the environment. We manage a governance framework for all material focus areas within our sustainable framework and follow best practice guidelines.

The following policies are available to all staff through our intranet:

- Code of Conduct
- Anti-Corruption Policy
- Procurement Policy

Due diligence within our supply chain

We conduct due diligence on our suppliers to identify any potential risks of modern slavery or human trafficking in our supply chain.

We build appropriate measures into our sourcing, supplier on-boarding and contract management processes to appropriately minimize our exposure to risk. Using supply chain due diligence principles enables us to make a judgement on transactions and the integrity of our supply chain.

We aim to build relationships with our suppliers to ensure they comply with our values, and that they are aware of our commitment to protect human rights and the environment. As part of our procurement processes, we require all of our suppliers to comply with the requirements of the Modern Slavery Act, and include appropriate contractual obligations within all of our commercial and procurement agreements.

Risk assessment and management

Our process for on-boarding suppliers, includes due diligence against key modern slavery risk indicators in order to determine whether appropriate policy and processes to identify and manage these risks are in place, and whether the level of due diligence they undertake and protection they afford their supply chain and employees is sufficient.

We will engage with those suppliers identified as having areas of potential risk to provide guidance on the support that is available to help mitigate their own supply chain risk and improve their own policy and processes with regards to modern slavery. For example making them aware of the UK Government Modern Slavery Assessment tool, which provides suppliers with tailored good practice recommendations to improve their anti-slavery activity.

We will continue to work closely with the supplier to remedy identified issues and put systems in place to ensure they meet our requirements and to also prevent issues in the future.

If a supplier fails to adequately remediate the issue, the relationship would be re-evaluated and if necessary, terminated.

Training

We provide training to our employees involved in our procurement processes to raise awareness of modern slavery and human trafficking, and to help them recognise, identify and report any potential

incidents. We also communicate our policies and procedures to our suppliers to ensure they understand our expectations and requirements.

We will ensure our staff involved in procurement activity are aware of and follow modern slavery procurement guidance on the **www.gov.uk** website.

Reporting and Investigation

We have a reporting mechanism in place for employees and suppliers to report any concerns or suspected incidents of modern slavery or human trafficking (risk.compliance@netreveal.ai). We investigate all reports and take appropriate action to address any issues that are identified.

Continuous Improvement

We are committed to continuously improving our policies and practices to prevent modern slavery and human trafficking. We regularly review and monitor our policies, practices and procedures, and make updates and improvements as needed to ensure they remain effective and to ensure we are meeting our commitment to this important issue.

We are committed to ensuring that our business and supply chain are free from modern slavery and human trafficking/exploitation.