

# Slavery and Human Trafficking Statement

This Slavery and Human Trafficking Statement 2023 (“**Statement**”) is made pursuant to the Modern Slavery Act 2015. It applies to organisations within the ESRI Holdings Limited group, as listed in the section ‘Organisational structure, business and supply chains’ below (collectively “**Group Companies**”). For the avoidance of doubt, neither Esri Inc (defined below) or ESRI Global Inc are part of the Group Companies.

This Statement outlines the measures, activities and Policy (defined below) of the Group Companies that applied or were undertaken during the period 01 January 2022 to 31 December 2022 (“**2022 Financial Year**”), and the measures, activities and Policy that will apply for the for the period 01 January 2023 to 31 December 2023 (“**2023 Financial Year**”). Additional details relating to activities for the 2022 Financial Year, and preceding financial years can be found in our ‘Previous Statement and Policy documents’ page on the Esri UK website ([www.esriuk.com](http://www.esriuk.com)).

The measures, activities and Policy set out in this Statement for the 2023 Financial Year are intended to ensure that slavery and human trafficking is not taking place within the Group Companies or in the Group Companies’ supply chain.

## **Organisational structure, business and supply chains**

ESRI Holdings Limited (“**ESRI Holdings**”) is a privately owned company registered in England & Wales. It is the ultimate parent company of the Group Companies detailed below.

ESRI (UK) Limited (“**Esri UK**”) is a wholly owned subsidiary of ESRI Holdings and is a privately owned company registered in England & Wales. Esri UK provides Geographic Information Systems (“**GIS**”) software and solutions to a wide range of customers. Esri UK’s business activities include distributing third party product, computer programming, undertaking professional consultancy services, training and support.

Esri UK is the authorised distributor of Environmental Systems Research Institute, Inc. (“**Esri Inc**”), which is located in California USA, ‘ArcGIS’ technology for the market territory of the United Kingdom and Ireland.

Environmental Systems Research Institute Ireland Limited (“**Esri Ireland**”) is a wholly owned subsidiary of Esri UK and is a privately owned company registered in the Republic of Ireland. Esri Ireland provides GIS software and solutions to a wide range of customers. Esri Ireland’s business activities include distributing third party product, computer programming, undertaking professional consultancy services, training and support. Esri Ireland is (by virtue of appointment via Esri UK) the authorised distributor of Esri Inc technology for the market territory of Ireland.

ESRI (UK) Property Limited (“**Esri UK Property**”) is a wholly owned subsidiary of ESRI Holdings and is a privately owned company registered in England & Wales. Esri UK Property provides rental services to the Group Companies.

Helyx Secure Information Systems Limited (“**Helyx SIS**”) is a wholly owned subsidiary of ESRI Holdings and is a privately owned company registered in England & Wales. Helyx SIS provides GIS

software and solutions, consultancy, training and support services to a wide range of customers, with a specific focus on defence and security customers.

The supply chain for the Group Companies is primarily comprised of organisations within the United Kingdom and Ireland, and occasionally those based in the USA or Europe. The activities of the Group Companies are primarily undertaken in the United Kingdom and Ireland, or in Europe. The Group Companies do not normally operate outside of these countries.

Other non-trading / dormant companies of ESRI Holdings and its subsidiary companies, or companies associated with the ownership of ESRI Holdings, are not detailed here, although further details are available upon written request. This Statement applies to all such companies.

### **Policy in relation to slavery and human trafficking**

#### Policy in relation to Slavery and Human Trafficking (the “Policy”):

We do not permit, condone or otherwise accept any form of slavery and/or human trafficking (as defined in the Modern Slavery Act 2015) whether by our employees, subcontractors, contractors, agents, partners or any other organisation, entity, body, business or individual with whom we engage or do business with (“**Associated Party**”).

We are committed to preventing any form of slavery and/or human trafficking in our activities; our Associated Parties shall also ensure that their organisation is free from any form of slavery and/or human trafficking. We and our Associated Parties shall adhere to all applicable laws relating to slavery and/or human trafficking.

We and our Associated Parties shall ensure that the following freedoms of our workers are recognised: freedom of association; freedom of movement; and the freedom to terminate their employment.

We and our Associated Parties shall prohibit any form of the following: forced labour; child labour; compulsory overtime; discrimination; use of threatened or actual force, intimidation, or violence; confiscation of workers identification documentation; and worker-paid recruitment fees.

In the event that we suspect any slavery and/or human trafficking or breach of this Policy by an Associated Party, we reserve the right to: report such suspicions, provide appropriate information to the relevant authorities, and to suspend or terminate any associated engagement, business arrangement or contract. We have a zero-tolerance approach to any slavery and/or human trafficking.

Each Associated Party is required to:

- Put in place suitable management policies / system(s) for ensuring compliance with the Policy.
- Extend the principles set out in this Policy to those engaged or acting on the Associated Party’s behalf, including contractors.
- Ensure that its workers are free to access appropriate complaints or grievance procedures or to seek remedy or justice for breach of their rights.

- Review its purchasing practices to ensure that worker conditions are not adversely impacted (for example, where practices may involve aggressive pricing, short lead times, delays in payments, unfair penalties).
- Permit us to audit compliance with the Policy, including making records available to us to demonstrate compliance with the Policy.

### **Due diligence processes in relation to slavery and human trafficking in our business and supply chains**

In order to ensure that no slavery and/or human trafficking takes place within our supply chain, we:

- Have incorporated the Policy into our Business Conduct Principles for suppliers, subcontractors and partners (“**Business Conduct Principles**”). The Business Conduct Principles apply to our suppliers, contractors and partners.
- Publish the Policy on the website of each applicable Group Company, for public access.
- Publish our Business Conduct Principles; these are currently available via the Esri UK website ([www.esriuk.com](http://www.esriuk.com)).
- Have incorporated the Business Conduct Principles and thereby the Policy into applicable Purchasing Terms (currently applicable to Esri UK and Esri Ireland). The Purchasing Terms apply to most of our suppliers.
- Include acceptance of the Policy as a pre-condition in our supplier pre-approval process.
- Undertake any necessary due diligence on organisations within the supply chain to ensure their suitability and ability to comply with the Policy.

During the 2023 Financial Year we will ensure that the above continues to apply.

### **The parts of the Group Companies’ business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps taken to assess and manage that risk**

Suppliers and subcontractors: there may be a risk of slavery and/or human trafficking through organisations with whom we contract for the supply of products or services, or through organisations with whom we subcontract work to or partner with.

The appointment of suppliers and subcontractors is subject to careful due diligence to ensure that there is no perceivable risk of slavery and/or human trafficking. We engage only with reputable suppliers or parties that do not engage in any form of slavery and/or human trafficking.

All such parties are expected to adhere to the Business Conduct Principles, which for Esri UK and Esri Ireland have been incorporated into the process for being appointed as such and/or the relevant contractual relationship.

We avoid contracting with suppliers or subcontractors which are located within geographical areas where slavery and/or human trafficking are a risk. In the event that we need to contract with suppliers or subcontractors outside of the United Kingdom, we assess the supplier/subcontractor and the relevant geographic area on a case-by-case basis, undertaking any necessary due diligence in accordance with the paragraph below.

We do not permit our suppliers to subcontract work or to supply products from any third party, save where our prior written permission is first obtained. In such situations the supplier is required to

undertake adequate due diligence to ensure and to satisfy us that there is no risk of slavery and/or human trafficking in the third party's supply chain.

Our ISO, H&S and Security Officer is responsible for any compliance matters set out in this Statement and Policy, for ensuring due diligence and for undertaking audits. Our HR Team and Legal Team are jointly responsible for ownership of this Statement and Policy, including ensuring that it is up to date.

**Our effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate**

The effectiveness of ensuring that slavery and/or human trafficking is not taking place in our business or supply chains shall be assessed by application of the following key performance indicators:

- To raise awareness of slavery and/or human trafficking by bringing the contents of the Statement and Policy to the attention of its staff, including (where applicable) by publishing it under 'Company Policies' on our internal portal and providing a formal notice to it on the internal portal home page. [Date required: continuous.]
- Require all staff that are to work in countries where slavery and/or human trafficking is a risk to complete specific and tailored (to the country in question) training on preventing slavery and/or human trafficking. [Date required: as and when applicable.]
- Require staff (HR Team) that induct new employees to introduce employees to the Statement and Policy. [Date required: ongoing throughout the Financial Year.]
- Provide training and guidance (Legal Team) to all employees on preventing slavery and/or human trafficking as part of staff training. Refresher training to be provided during the course of 2023. [Date required: by end of 2023.]
- Review the existing training and guidance (see bullet above) and make any required updates (including, targeted training, reporting, the indicators of modern slavery and/or human trafficking and forced labour). [Date required: by end of 2023.]
- Continue to ensure that supplier adherence to the Policy and the Business Conduct Principles is part of the supplier appointment process. All suppliers must adhere to this prior to becoming a supplier.
- Review our purchasing practices to ensure that worker conditions are not adversely impacted. [Date required: by end of 2023.]
- Review how we investigate / assess the modern slavery risks with our Associated Parties. Can we undertake activity that assists workers in our Associated Parties. Review all existing supply chains. [Date required: annually.]
- Review (i) our reporting modern slavery and/or human trafficking process, and (ii) how we respond to reports of modern slavery and/or human trafficking. [Date required: by end of 2023.]
- Update the historic copies of the Statement and Policy on our applicable websites (to include the 2022 Financial Year Statement and Policy). [Date required: by February 2023.]

**Training about slavery and human trafficking available to our staff**

Visibility of the Statement and Policy on the internal staff portal (where applicable).


Communication to staff to read the Statement and Policy, and the new training.

Annual reminder to ensure that staff are familiar with the Statement and Policy.

New staff to be introduced to slavery and/or human trafficking as part of their induction. Extend training to all staff (not just new staff).

Specific training to be provided to any staff who are required to work in countries where slavery and/or human trafficking is deemed to be a significant risk.

This statement has been updated (effective 01 January 2023) and approved by the ESRI Holdings board of directors.

Signed  Stuart Bonthron, Managing Director

Dated 16 January 2023