

Modern Slavery and Anti-Trafficking Statement and Policy

Updated March 2024

The World Ethical Data Foundation (WEDF) is committed to the principles and required conduct needed to prevent modern slavery and trafficking.

The Organisation supports Article 5 of the EU Charter of Fundamental Rights in its entirety throughout the WEDF's operations.

Our governance policies are in development. Where differences in legal terms, clauses or standards may apply, European law supersedes any others.

Our commitment to prevent the existence of modern slavery and trafficking extends beyond our own business practices and to the operations, policies and practices of our supply chain.

Stichting World Ethical Data Foundation is based in The Netherlands and strictly adheres to European Law. WEDF believes in a world where technological progress serves humanity because it's governed by ethics that bring us closer together.

To achieve this, the WEDF works across multiple geographies and communities, including the vulnerable and marginalised.

Within our supply chain the WEDF works with external businesses, self-employed consultants, public traded companies, non-governmental organisations, community-based organisations and not-for-profit organisations located around the world.

The WEDF recognises that some of our partners operate in origin, transit and destination countries for human trafficking and countries with high levels of modern slavery. Therefore, the WEDF works with our supply chain partners to conduct due diligence and to operate with transparency.

The WEDF's leadership is under the direction of the General Director and Senior Management Team who oversee and enforce the WEDF's policies with all representatives.

A Organisation Code of Conduct was introduced to ensure that all representatives adhere to uniform policies that prevent exploitation, institutionalise equality and set out how to handle grievances, rights violations and abuse.

Policies

WEDF is committed to enforcing anti-slavery and anti-trafficking practices in all of its work. All partners, consultants, contractors, representatives and clients that WEDF engages with

must demonstrate a serious commitment to complying with human rights laws and, where legislation is weak, to standards set by international organisations and agreements.

All contracts issued to third parties require compliance with ethical and compliance standards set forth in this and other policies. All employees, consultants, contractors and representatives are required to read all policies and by representing the foundation in any capacity in which the name or work of WEDF is referred to, they are accepting that they have read, understand and will comply with WEDF policies and Code of Conduct.

WEDF takes a zero-tolerance approach to modern slavery and trafficking; and has embedding practices in the organisation's policies to prevent modern-slavery and trafficking in the supply chain. The policies include issues related to recruitment, reporting of violations and ethics. They are available for public reference and include, but not exclusively:

- Anti-Bribery and Corruption
- Anti-Bullying and Harassment
- Diversity and Inclusion
- Modern Slavery
- Grievance Procedure
- Disciplinary Procedure

WEDF expects its entire supply chain to obey the law and comply with policies and guidelines. However, should an employee, consultant, contractor or representative be suspected of not obeying the law or conducting business in an unethical manner, a WEDF Whistleblowing Policy may be enacted.

Due Diligence

WEDF has a due diligence process that applies to all service providers in our supply chain. The Foundation conducts due diligence on companies and individuals with whom the Foundation enters agreements.

When conducting due diligence, the Foundation considers the nature of the business (listed company, private company, individual consultant, charity etc.) and conducts it accordingly to ensure that vulnerable workers are not being trafficked or enslaved in filling positions of low or unskilled labour along the supply chain.

Risk Assessment and Management

WEDF takes the management of risks in all its operations seriously. The Foundation reviews and revises its exposure to, and creation of, risks based on changing contexts. In addition to risk associated with individual operating environments and operating risks, we assess risks associated with forced slavery and trafficking in the supply chain and factors that contribute to serious violations of workers' human rights. Our risk assessments take into account the following issues which can contribute:

- Subcontracting and the complexity of a supply chain
- Nature of the relationship between the supplier and the Company
- Presence of any labour recruiters within the supply chain

- Existence or non-existence of government regulation and/or poor enforcement of labour standards
- Presence of cheap labour and high number of vulnerable workers
- Absence of effective workers' organisations / collective agreements
- Nature and the location of the work

All suppliers are expected to respect human rights and operate with a zero tolerance of modern slavery across their business, address any identified risks of modern slavery, monitor and evaluate measures in place and communicate and report any incidents of modern slavery.

Reporting Violations

Any suspected or reported incidents of modern-slavery or trafficking that have been reported to or identified by the Foundation or associated agents will be investigated and reported to the appropriate authorities. All information relating to the incident(s) will be held on a secure network with password protected documents.

Approval and Document Control

Version	Approved By	Approved	Review By
Disciplinary Procedure v1.0	WEDF Executive Director	25/03/2024	31/03/2025