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Modern Slavery Act Transparency Statement, January 2021

On behalf of Aptum group of companies, this statement sets out the actions taken in the past year, ending December 31, 2020, to ensure that Slavery and Human trafficking do not exist in our supply chains or any other part of our business, prepared specifically as required by s54. of the UK's *Modern Slavery Act, 2015*.

Aptum acknowledges the important role that suppliers play in its corporate social responsibility efforts, especially with regards to the environmental and social impacts of their activities. During the past year Aptum has established and monitored its Environmental, Social and Governance (ESG) standards, incorporating its corporate social responsibility program, including establishing its Business Conduct & Ethics policy applicable to all persons whether employed, consultants or contractors that contribute to our business. In addition, Aptum has introduced a Supplier Excellence program that requires our suppliers to adhere to our Supplier Code of Conduct as part of our vendor compliance and seeks to implement best practices within Aptum's supply chain. A key tenet of both these policies is respect of fundamental rights and freedoms of all individuals.

Accordingly, Aptum wishes to engage in business with suppliers that demonstrate strong commitment to sustainability and ethical behaviour. As with many technology companies with an extended 'upstream' supply chain, much of which is not easily identifiable to our people, we are dependent on our suppliers' own efforts to ensure ethical behaviors from its supply chain. Our main suppliers are networking and IT technology providers, IT equipment manufacturers/suppliers, professional and construction service providers.

We have established an independent whistleblower line for any person to anonymously report non-compliance with our Supplier Code of Conduct without fear of repercussion or retaliation. The Board of Directors, via our Audit Committee will be updated on our implementation of the Supplier Code of Conduct on an annual basis as part of our Corporate and Social Responsibility Reporting.

Susan Bowen
CEO, Aptum