

CONFIDENTIAL

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# Modern Slavery Statement

## Revision History

Created/Modified By	Date of Last Modification	Overview of Last Modification
Ramin Zacharia	06/15/21	Initial Version
Aaron Kirkpatrick	06/15/22	Annual Review

## Modern Slavery Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”) and details the measures taken by Venminder, Inc. (“Venminder” or “the Company”) to mitigate and reduce the potential risk of human trafficking and modern slavery that may occur across its business. This is inclusive, but not limited to, Venminder’s customers, vendors, supply chain, and other areas of the business.

### Executive Summary

Venminder is dedicated to third-party risk management. As a full-services provider, our solutions are trusted by over 1100 organizations, and both Gartner & the ICBA have endorsed Venminder as the leading vendor risk management provider. Venminder’s customers range from small to large enterprise organizations, and whether your business is seeking to move off spreadsheets and mature your program or outsource critical due diligence control assessments, we can help to transform and improve the vendor risk management program. Our model is to consult and collaborate with your team to increase the efficiency and effectiveness of vendor lifecycle management.

### Venminder’s Values and Commitment

Venminder is against any form of human trafficking and modern slavery, and acts with full integrity across all business and operational relationships. The Company is committed to maintaining full compliance and adherence to all applicable labor/employment laws and regulations. This commitment includes continuous monitoring and ongoing assessment of human trafficking and modern slavery across all areas of the Company’s business and ensuring that the challenges and risks created by human trafficking and modern slavery are addressed and mitigated appropriately.

This document summarizes the various workflows that Venminder has implemented to identify, assess, and monitor areas of risk created from modern slavery across every part of the business.

**Below are Venminder's commitments:**

- Venminder is committed to ensuring that there are no forms of human trafficking, exploitation, and modern slavery in any part of the Company's business and operations.
- Venminder is committed to implementing, maintaining, and enforcing effective workflows, systems, and controls that work to address and mitigate the risk that arises from human trafficking and modern slavery.

**Overview of Venminder's Structure, Business, and Supply Chain**

Venminder provides a comprehensive platform of software, risk assessments, managed services, and ongoing monitoring for third-party risk management. Nearly 1100 customers across a variety of industries contract with Venminder to manage their third-party risk management programs, reduce and mitigate risk across vendors and third parties, and meet/maintain strict regulatory guidelines and policies.

The Company is headquartered in Kentucky with employees located in Kentucky and across the United States to meet and deliver for the unique needs of customers. To meet customer needs and extend the capability of the platform, Venminder also contracts with vendors across its supply chain.

**Risk Assessment and Due Diligence Processes**

As part of ensuring that there is no human trafficking and modern slavery within the Company's vendor base, supply chain, or in any other part of the business, Venminder conducted a risk assessment.

With respect to the Company's employee and contractor base, these areas were identified a low risk, given the written process and documentation that Venminder goes through with each employee and contractor, and the fact that Venminder strictly follows U.S. labor laws and regulations. Additionally, the Company has adopted an anonymous reporting / whistleblowing hotline that is open to all employees that can help identify these risks and concerns, as necessary.

With respect to the Company's supply chain and other vendors, these areas were similarly identified as a low risk, given the due diligence and vendor vetting/screening that Venminder conducts prior to entering into any new agreements or relationships. Appropriate questionnaires and documents are requested from all vendors prior to contracting and onboarding, and Venminder conducts regular third-party monitoring and maintenance of documentation to ensure this risk is properly mitigated. When a risk or potential area of concern is identified pertaining to human trafficking and modern slavery within the business or supply chain, Venminder has put workflows and processes into place to thoroughly and properly investigate and address the risk or potential area of concern. This includes increasing due diligence efforts, information gathering, and monitoring of areas that may be identified as higher risk.

## Internal Policies and Organizational Awareness

As part of addressing human trafficking and modern slavery, Venminder is proactive in communicating its efforts, policies, and procedures to its entire organization. Given the broad reach and impact that human trafficking and modern slavery risk presents, the Company has integrated its commitment to managing these risks into many other areas of the business. These policies and procedures are updated regularly and made available to employees on the Company's internal human capital management software platform.

- Modern Slavery Act Statement / Policy
- Code of Conduct Policy
- Whistleblower Policy/Anonymous Reporting
- Anti-Bribery and Corruption Policy

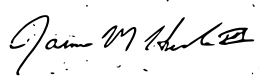
Venminder makes its employees and organization aware of how to properly report any suspected or identified instances of human trafficking and modern slavery. The Company provides proper training and awareness of utilizing the Company's anonymous reporting/whistleblowing hotline to all employees to help mitigate this risk.

## Summary

Venminder is committed to ensuring that there are no forms of human trafficking, exploitation, and modern slavery in any part of the Company's business and operations, and implementing, maintaining, and enforcing effective workflows, systems, and controls that work to address and mitigate the risk that arises from human trafficking and modern slavery.

Venminder acknowledges that the challenges brought on by human trafficking and modern slavery are continuous and ongoing. The Company will continue to remain at the forefront of investing time and resources, promoting awareness, creating, and implementing policies and procedures, and conducting thorough due diligence to reduce and mitigate any risks that are posed by human trafficking and modern slavery with the Company's supply chain.

This statement is approved by Venminder's Board of Directors and will be reviewed annually. It is made available publicly on our website at [www.venminder.com](http://www.venminder.com).



**James Hyde**  
**Chief Executive Officer**