

Modern Slavery Policy

Policy statement

Modern slavery is a crime and violation of our most basic human rights. PopcornApps has a zero-tolerance approach to modern slavery, and we are committed enforcing policies and procedures that ensure that modern slavery does not occur in our business and in our supply chain. We oppose slavery and human trafficking in all its forms and this policy applies to all persons working for us in any capacity, including employees and contractors.

Background

The Modern Slavery Act 2015 requires all business entities that carry on a business, or part of a business, in any part of the United Kingdom to prepare and publish a slavery and human trafficking statement for each financial year of the organization. The law also creates the obligation to report on steps taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of its supply chain or in any part of its own business. PopcornApps UK Limited abides by this law.

Commitment

PopcornApps is committed to conducting our business in the United Kingdom and abroad in a manner that complies with applicable laws and regulations. We are committed to ensuring that human trafficking doesn't occur in our business or in our supply chain. We are committed to ethical trading principles and to acquiring goods and services without harm to others.

Scope

This policy applies to all persons working for us in any capacity and at all levels, and it must be enforced by general management, procurement, and recruitment functions in all the regions that PopcornApps operates in, within our business and with our supply chains.

At the time this document was last reviewed our supply chain comprises of the following:

- Software providers
- Telecom providers
- Hardware providers

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- Software contractors

Expectations

PopcornApps operations are present in the United States of America, United Kingdom and in India. Our business is of providing software services around the consultancy, architecture, design, development, integration, implementation, testing deployment, and maintenance of software applications for our clients.

As such our supply chain is not complex as our delivery of such services comprises almost entirely of direct employees, and we have minimal or no use of third parties in the delivery our services to our clients.

However, like every business we have suppliers, and we expect that our suppliers meet the following minimum expectations:

- Not use or be involved in forced, bonded, debt bonded or indentured labour, involuntary prison labour, minors, or victims of human trafficking
- Not use and be involved in coercion or any kind with their workers and supply chains, including threat, abduction, financial blackmail, control over identity, immigration, and work permit documents (unless required by law)
- Not use or be involved in the use of misleading or fraudulent practices in the recruitment of their employees or workers
- Ensure that workers, employees, and contractors are not required to pay employers or agents any fees or bribes related to their employment
- Be compliant with our modern slavery policy and meet applicable local laws to ensure that employees, contractors, and workers are not exploited

In that event a supplier is not compliant, refuses to take timely corrective action, or cooperate with our compliance we will reconsider our supply arrangement with such a supplier.

Compliance

As an employee, consultant, contractor, intern, apprentice, supplier or business partner of PopcornApps you must ensure that you read and comply with this policy.

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The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all working for us, or under our instruction. You are required to ensure that no activity will lead to a breach of this policy.

Towards this, you must ensure that you are aware of and abide by the following:

- Raise concerns about any issue of suspicion of modern slavery in any part of our business or supplier
- Notify your manager, HR contact, or region head as soon as possible if you believe or suspect that a breach has occurred, or a breach may occur, or an event that is conflict with this policy has occurred or may occur
- When in doubt whether an issue or event may relate to modern slavery, always err on the side of caution, and consult with your HR contact or region head as soon as possible about the matter

Due Diligence

Due diligence is an ongoing management activity intended to ensure compliance with our commitment to the prevention of modern slavery. Towards this PopcornApps UK Limited and group companies will conduct due diligence and require any businesses in the supply chain to comply with and assist us in complying with this policy.

To help identify and monitor the risk of slavery and human trafficking in our supply chain we must (a) vet suppliers and sub-contractors to ensure that they are committed to ethical labour practices, (b) include anti-slavery and human tracking provisions in all our contracts with suppliers.



Anish Matthai

Managing Director

PopcornApps UK Limited

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