Policy Name	**Slavery and Human Trafficking Statement**
Process	**HR-037**
Updated By	**David Raw**
Approved By	**Kim Morton**
Version	**4**
Date	**25th April 2019**

Policy Statement

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibly to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Organisational Structure

Exela Technologies is a global leader in payment, document and content processing solutions and outsourcing services. The group has its head office in Dallas in the USA and trades from more than 50 countries globally.

Our Business

Our business encompasses the provision of business process operations for a wide range of organisations within the financial, healthcare, insurance, utility, business service and other sectors; software design and implementation as well as hardware sales and support.

Our Supply Chains

Our supply chains include the sourcing of raw materials principally related to the provision of business process services but also some hardware procurement.

Due Diligence Processes For Slavery And Human Trafficking

As part of our initiative to identify and mitigate risk –

- We ensure all employees are background screened to ensure that both our clients and our team are protected from financial irregularities, potential bribery and or corruption. As part of this screening process those individuals who may become affected by slavery and human trafficking would be highlighted;

- We build longstanding relationships with suppliers wherever possible and make clear our expectations of business behavior;

- With regards to national or international supply chains, our point contact is preferably with an EU or US company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain;

- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Supplier Adherence To Our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values in this regard and will report all shortcomings to the relevant authorities.

The directors of the business are responsible for compliance in their respective departments and for their supplier relationships.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

Our Effectiveness In Combating Slavery And Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Screening of all employees both direct and indirect;

- Use of labour monitoring and payroll systems; and

- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's slavery and human trafficking statement for the current financial year.

CHANGE HISTORY *

Date	Version	Created by	Description of change
25.04.2019	4	David Raw	Annual review. No amendments.
23.07.2018	3	David Raw	Insertion of change history table & annual review.
20.10.2017	2	David Raw	Annual review & re-branding to Exela

(*****) Full update details available in the ISO Record file (changes to policies & procedures)