

MODERN SLAVERY STATEMENT

Introduction

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015. It constitutes Sincerus Global Solutions (Sincerus) slavery statement and human trafficking statement. This statement covers the activities Sincerus engages in that provide professional law enforcement, defence and institution development including training services to a variety of US and international government clients.

Our Commitment

Sincerus Global Solutions acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking within its own businesses and in its supply chains. The business understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.

We have a zero-tolerance policy towards modern slavery. We will refrain from entering into business which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

Definitions

Sincerus considers that modern slavery encompasses:

1. Human trafficking
2. Forced work, through mental or physical threat
3. Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
4. Being dehumanised, treated as a commodity, or being bought or sold as property
5. Being physically constrained or to have a restriction placed on freedom of movement.

Our Supply Chains

Sincerus is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to acting ethically and with integrity in all its business relationships.

Policies

Sincerus has provided policies which aim to minimise the risk of modern slavery in our business. These include:

- Compliance with Countering Trafficking in Persons which defines our commitment to honest and responsible conduct, decrease the likelihood of



unlawful and unethical behaviour, and encourage employees to report potential problems to allow for appropriate internal inquiry and corrective action. We actively conduct risk assessments and take our commitment to CTIPS compliance very seriously; and

- Whistleblowing Policy which encourages staff to report concerns or wrongdoing which is in the public interest, including any related to modern slavery/trafficking and child or forced labour.

Due Diligence

We continue to monitor suppliers we believe present high modern slavery risks in our supply chain.

All suppliers which we class as high risk must complete our Modern Slavery Act Due Diligence Questionnaire which covers their governance, policies, training, and supply chain management processes. Sincerus is responsible for assessing the information submitted by suppliers. Should a supplier fail to provide the information requested or to meet our expectations, Sincerus will take appropriate action, which may include not entering a relationship or terminating the relationship with the supplier concerned.

Training

We continue to provide advice and guidance to those teams who have direct responsibility for relevant supply chains and upon commencement of employment in further modern slavery training. We also maintain a Modern Slavery Act Guidance document which is available to all staff on our centralised database. All staff are made aware of the business policies relating to standards of behaviour that it requires from them and who to report any concerns to.

Looking Ahead

Over the course of the next financial year, we will continue to enhance our procedures to help us identify, prevent, and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

Approval

This statement has been formally approved by the CEO of Sincerus Global Solutions:

Glen Schumacher, Chief Executive Officer