

IMPACT RADIUS LIMITED (“impact.com”)
Modern Slavery Statement

INTRODUCTION

This statement sets out impact.com’s actions aimed at preventing slavery and human trafficking in its business and supply chain.

impact.com is committed to conducting its business ethically and has taken steps to uphold this commitment by working to ensure that slavery and human trafficking is not taking place in its supply chains or in any part of its business. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes impact.com’s slavery and human trafficking statement in relation to its actions and activities for the financial year ending 31 January 2023.

ORGANISATIONAL STRUCTURE AND BUSINESS

impact.com, the world’s leading partnership management platform, provides technology solutions to advertisers and publishers that transforms the way businesses manage and optimize all types of partnerships. impact.com is part of the impact.com group (the “Group,” “our” or “we”), which includes impact.com’s parent company, Impact Tech, Inc. (“**Impact Tech**”). Impact Tech has its head office in Santa Barbara, California, USA. The Group operates in multiple jurisdictions globally.

Our values guide everything we do. We believe that treating everyone with integrity and respect is critical to our success, both as an employer to our global workforce and as a partner to the thousands of well-respected brands and partners with whom we do business.

Towards that end, we are committed to ensuring that our business and supply chains are free from human trafficking and modern slavery in any form. We choose business partners who share our values and commitment to conducting their businesses in an ethical and transparent manner.

OUR SUPPLY CHAINS, OUR COMMITMENT AND OUR POLICIES

The nature of our business generally presents a low risk of modern slavery and human trafficking in our business and supply chains. impact.com provides an online software platform and associated services. We do not manufacture physical products or widgets, and our main suppliers are comprised of companies that similarly sell software as a service, professional advisors (such as accountants and legal advisors), and other miscellaneous business suppliers (including suppliers of I.T. and other office equipment, office maintenance and cleaning products, and cleaning and travel services). The majority of our suppliers are based in either the United Kingdom or the United States. As a result, our supply chain is relatively non-complex in structure and presents a low risk of modern slavery and human trafficking.

Nevertheless, we are committed to ensuring that there is no modern slavery, human trafficking, slavery or compulsory labour in any part of our business or our supply chains. Accordingly, our policy is to ensure that our agreements with suppliers and vendors contain terms requiring them to comply with all applicable laws, including the Act. We endeavor to conduct due diligence of such third parties and take

swift corrective action if it is brought to our attention that such third parties have violated our policies or applicable laws.

Furthermore, we outline our expectations to our employees through the policies included in our employee handbook, including our code of conduct and policies that reinforce the importance of dignity and respect in the workplace and strictly prohibit unlawful discrimination and harassment. Our policies include procedures encouraging employees and staff to report and escalate any violations of these policies and empower the company to take corrective action.

FURTHER STEPS

We will periodically review the effectiveness of our processes and systems and any changes will be reflected in future annual statements.

Impact Radius Limited

A handwritten signature in black ink, appearing to read 'Per Pettersen', written in a cursive style.

Name: Per Pettersen

Title: Director

Date: 20 May 2023