



# **MODERN SLAVERY AND HUMAN TRAFFICKING - STATEMENT FOR FINANCIAL YEAR 2019**

**Web Shield Limited**

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## 1. PREAMBULE – POLICY STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps that Web Shield Limited (hereinafter: “**Web Shield**” or “**Company**”) has taken to prevent modern slavery and human trafficking.

The mission of the Web Shield is to help acquiring banks, payment service providers and other actors in the payments space to protect themselves from persons and entities involved in illegal or non-compliant activities.

Web Shield is committed to a work environment that is free from human slavery and trafficking, which for purposes of this policy, includes forced labour and unlawful child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. Web Shield will not tolerate such activities in any part of our business or our supply chain. We implement and enforce effective systems and controls to mitigate this risk of any violations. Web Shield undertakes steps to protect human dignity and human rights in our global business practices.

This policy applies to all persons working for, or on behalf of Web Shield, in any capacity. This includes but does not limit the policy applicability to: employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives and business partners.

## 2. SUPPLY CHAINS

Web Shield has relationships with hundreds of suppliers around the world. These suppliers range from financial institutions and consulting firms to specialist of hardware and product packaging. We also work with number of other partners who provide everything from advertising services to office supplies. Thanks to our extensive contacts, we want to promote respect for human rights, set a good example and exert a positive influence on all our contractors.



### **3. TRAINING**

All Web Shield's employees are responsible for reading, understanding and complying with this policy. To raise awareness of modern slavery and human trafficking risks in our supply chain and our business we provide training to our employees. Web Shield managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them. Training has to provide information for workers on how to recognise and report hidden exploitation in relevant languages and for supervisors and managers to talk informally to workers on a regular basis to understand whether any are experiencing issues such as harassment, coercion, bullying, control or exploitation.

### **4. SYSTEM OF CONTROL, PREVENTING AND CORRECTIVE MEASURES AND REPORTING OF INFRINGEMENTS**

Firstly, it is important to understand the type and severity of the issues in question, which areas of our supply chain are most vulnerable and which key suppliers pose the most risk. In order to identify the risk, we will use reports from media and non-governmental organizations. We are going to prepare list of that areas, which will be updated with each new financial year. We will develop a due diligence approach that targets those high-risk areas, processes or activities that require the closest attention and where we can apply influence to mitigate or remediate issues, where they occur. These include areas where labour law infringements, discrimination, harassment and non-compliance with health and safety at work have occurred previously. If necessary our Management create a special list of activities which constitutes non-compliances or bad practices and how these should be remedied, and provides examples of best practice and case studies.

All new and directly contracted suppliers undergo initial risk and capability assessments and audits to assess their conformance. We would like to emphasize that we do this with regard to both human rights and the principles of business ethics. The result of the initial analysis is the basis for further actions.



If we notice any violations in our structures or entities related to us, we will immediately take corrective measures and to prevent such events in the future. Among them should be indicated, for example:

- put in place a multi-language confidential helpline process through which issues can be raised confidentially by phone, email or in writing;
- delegation of a specific manager who is separate to the direct supervision of the worker;
- introduction complaints procedure, issued to all workers and operated fairly and independently;
- training Management in monitoring, registering and reporting cases of harm suffered by employees for various reasons;
- draw up an initial high level assessment of your supply chain, including direct and indirect suppliers, labour providers and contractors to identify low, medium and high risk suppliers;
- issue occasional confidential questionnaires to a sample of workers through a variety of means (email/ post/ group-completion) to understand if any workers are experiencing issues such as harassment, coercion, bullying, control or exploitation;
- application of intensified monitoring of activities that may lead to modern slavery;
- intensified analysis of labour documentation, policy, contingency planning, and labour agency contracts;

We expect the highest diligence and effectiveness both from ourselves and our suppliers. If it is necessary to apply corrective measures, we will set an appropriate term to carry out this procedure.

The responses for our questionnaires and identified risk areas will help us to review and control individual cases more detail. Responses are diligently reviewed by Web Shield Management. The wide range of knowledge allows us to reduce the risk of modern slavery and manage incidences where they occur.

If there are evidences of human trafficking, slavery-like practices, child labour or other unacceptable practices, the Company will immediately take appropriate steps to report to the appropriate governmental agencies to conduct the proceedings.



## **5. RESPONSIBILITY FOR THIS POLICY**

Our Chief Executive Officer has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

The Web Shield's Head of Operations has primary responsibility for implementing this policy. This includes responsibility for the monitoring of its use and effectiveness, auditing of internal control systems and procedures. The Head of Operations is also responsible for updating the policy to reflect any changes in legislation.

The Head of Operations may appoint a Compliance Manager for employees in matters related to this policy.

The Head of Operations may delegate the appropriate manager to supervise individual employees, as well as use all necessary measures that, in his opinion, will reduce the risk of breaches or will constitute remedies.

Management at all levels of Web Shield are responsible for ensuring those reporting to them understand and comply with this policy, and, are given adequate and regular training on modern slavery.

The Head of Operations will appoint the appropriate person to develop a training program for the employees in the field of counteracting and responding to the symptoms of modern slavery.

The Web Shield's employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to their representative.



## **6. COMPLIANCE WITH THIS POLICY**

All partners and employees must read, understand and comply with this policy. Everyone working for Web Shield is responsible for preventing, detecting and reporting modern slavery if it is encountered.

Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.

Employees must notify to their directly supervisor or Compliance Manager (if appointed), as soon as possible, if they believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future. They can also report any suspected breach by the same way.

We encourage everyone to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your directly supervisor or Compliance Manager.

We encourage our suppliers to establish their own procedure and detection any violations of the policy.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the direct supervisor or Compliance Manager immediately.



Head of Operation is responsible for regular verification of compliance with our policies and procedures.

## **7. COMMUNICATIONS AND AWARENESS**

Modern Slavery training, which includes identifying signs of Modern Slavery and reporting suspicions of Modern Slavery with Web Shield's supply chains, forms part of the induction process for employees. Refresher training will also be provided as necessary.

Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on boarded.

## **8. PREVIOUS RESULTS OF AUDITS**

So far, we have not recorded cases related to modern slavery and trafficking in human beings. In the 2018 financial year, we did not ignore any signal regarding violations and we thoroughly reviewed the information received. The implemented communication system and training system contributed to a large extent to reducing the risk of side effects. The preventive measures applied in the last year have been effective and satisfactory.

In the next 12 months we will continue our efforts in range of maintain compliance with Modern Slavery Act within our business and ensure our strategy is responsive to changing risks on the each level of our supply chains. We would also like to draw more attention to foreign migrant workers taking up employment among our partners and suppliers. We will investigate if such employees are not subjected to forced labor.





## 9. BREACHES

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

**It is a statement made in accordance with section 54 of the Modern Slavery Act 2015 and covers the financial year ending 31 December 2019.**

*Approved by Christian Chmiel  
Chief Executive Officer, Web Shield Limited*