Slavery and Human Trafficking Statement

Introduction

This statement sets out the actions Tenerity Limited ("**Tenerity**") has taken to mitigate potential modern slavery and human trafficking risks taking place in the business and its supply chains. This statement relates to actions and activities during the financial year ending 31st December 2023.

Structure of the organisation

Tenerity is a global firm in the customer engagement and loyalty solutions sector. It is a member of the Tenerity Group and has business operations across Europe and the UK. To find out more about the nature of our business, please click here. The Tenerity supply chain, in relation to its services, predominantly consists of IT development and software providers. Given the nature of Tenerity's business, the Board and Management consider the risk of modern slavery in the business or within its chain to be low.

Our Policy on Slavery and Human Trafficking

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in our business dealings and relationships. We will implement and enforce effective systems and controls to ensure modern slavery is not taking place in any part of our business.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- we thoroughly check and regularly review recruitment agencies by conducting background and visa checks;
- we ensure all staff have a formally written and signed contract of employment, are legally able to work in the UK, and names and addresses are checked;
- we ensure all staff are made aware of slavery and human trafficking through our on- boarding documentation and key UK policies;
- we include anti-slavery and human trafficking obligations in our contracts with suppliers;
- all new suppliers will need to address their modern slavery obligation which we monitor through our procurement and on-boarding;
- we have updated our Anti-Slavery and Human Trafficking Policy to reflect our continued actions to monitor the risk of modern slavery and human trafficking;
- we have made the updated version of the Anti -Slavery and Human Trafficking Policy available to all UK employees via the Tenerity's intranet and within on-boarding documentation; and
- we continue to monitor any supply chains deriving down from Tenerity Group which could be subject to Tenerity's anti-slavery and human trafficking policy
- implemented a supplier code of Conduct that incorporated this statement and require our suppliers and their supply chains would take steps to address it;
- created internal supplier forms for business to consider modern slavery risks before onboarding each new supplier

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains

Further actions

Following our review of our actions this financial year to ensure slavery and human trafficking is not taking place in our business or supply chains; we intend to take the following further steps to tackle modern slavery:

- Implement mechanism in contracts to ensure our third-party suppliers read and understand this statement and are taking steps to ensure human trafficking and slavery is not taking place in their business and supply chains;
- Ensure all contract renewals for clients and suppliers address modern slavery and human trafficking obligations (including the supplier code of conduct provisions);
- Investigate and mitigate against any modern slavery risks that may present itself across its group; and.
- Continue to monitor and improve upon our due diligence processes.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Tenerity's slavery and human trafficking statement for the financial year ending 31st December 2023.

Signed by:

Adrian Mehew
Director
20 June 2024

***2026 Update**: Tenerity Limited is not required to publish a modern slavery statement for the financial year ending 31 December 2025. This statement has been retained on the website for transparency and Tenerity remains committed to preventing modern slavery and human trafficking in its business and supply chains.*