

MODERN SLAVERY ACT OF 2015 STATEMENT

1. Introduction

We are committed to improving our practices to combat slavery and human trafficking in our business and supply chain. We are committed to ensuring there is no slavery or human trafficking in any part of our business and we will seek to ensure that our partners are equally committed to this cause.

2. Our policy on slavery and human trafficking

a. Scope

We have appropriate procedures and policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

b. Definitions

We recognize the United Nations Global Compact's ("UNGC") Ten Principles which are based on The Universal Declaration of Human Rights. The UNGC specific Ten Principles are:

1. Support and respect the protection of internationally proclaimed human rights.
2. Ensure we are not complicit in human rights abuses.
3. Uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Uphold the elimination of all forms of forced and compulsory labour.
5. Uphold the effective abolition of child labour.
6. Eliminate discrimination in employment and occupation.
7. Support a precautionary approach to environmental challenges.
8. Undertake initiatives to promote greater environmental responsibility.
9. Encourage the development and diffusion of environmentally friendly technologies.
10. Work against corruption in all its forms, including extortion and bribery.

Under the UNGC, Human rights are the same as labour rights; human trafficking and slavery assessments adopt UNGC assessment approach and definitions.

Supply Chain: Entities with which the enterprise has a direct or indirect business relationship and which either (a) supply products or services that contribute to the enterprise's own products or services or (b) receive products or services from the enterprise.

Due Diligence: Due diligence in the context of human rights comprises an ongoing management process designed to support the organization in meeting its responsibility to human rights. A human rights due diligence process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communicating how impacts are addressed.

Human Rights Risk: Any risks that a business's operations may lead to one or more adverse human rights impacts.

Adverse Human Rights Impact: An adverse impact occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights. A human rights impact may be actual or potential. Adverse impacts may be caused by an enterprise through its own activities; may be contributed to by an enterprise either directly or indirectly through an outside entity or may be caused by someone with whom the entity does business and is linked to the entities own operations, products or services.

Worker: Workers include direct employees, temporary workers, migrant workers, student workers, contract workers, and any other person(s) providing labour and employment services to entities in the supply chain.

c. Policy

While our services are sold globally, our supply chain and engagement with suppliers is extremely narrow. Nevertheless, we focus our efforts to comply with these rules. We expect our suppliers not to be involved in forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons of any age at any tier of the supply chain. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. Suppliers, as employers or agents, may not hold or destroy employees' identification or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law.

Employers may not restrict workers' freedom of movement in the facility or entering or exiting company-provided facilities. All work must be voluntary and workers shall be free to terminate their employment and leave work at any time. Employers and agents may not use misleading or fraudulent practices during the recruitment of employees.

As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment and the hazardous nature of the work, prior to the worker departing from his or her country of origin. Workers must not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees must be repaid to the worker.

We expect our suppliers to have a compliance plan in place to ensure that human trafficking and forced labour are not used and that risks of worker exploitation are mitigated. We will continue to promote and encourage our suppliers to take steps to ensure that slavery and human trafficking is not taking place in any part of our supply chain or in any part of their businesses. We expect our suppliers to conduct due diligence on their respective supply chains and to assist us with our compliance with these rules.

To the extent that a supplier refuses to cooperate with our compliance efforts, we may reconsider our supply arrangement and implement remedies available to us.

3. Organisation's structure

We are an internet technology company – focusing on creator platforms. We have over 50 staff members worldwide and provides its services to customers across the globe.

4. Our business

Our business is organised into seven business units:

- General & Executive Management
- Finance
- Human Resources
- Marketing
- Office of CTO
- Legal
- Product Management

5. Our supply chains

Our supply chain comprises a single point of production for online services (e.g., cloud-based online platforms with no tiering). We also conducts reviews of its vendors and suppliers through its vendor management process.

6. Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have the following systems in place:

- Identifying and assessing potential risk areas in our supply chains.
- Mitigating the risk of slavery and human trafficking occurring in our supply chains.
- Monitoring potential risk areas in our supply chains.
- Maintaining a non-retaliatory mechanism for reporting any concerns related to this policy. Please report any concerns or queries related to this policy to legal@sinparty.com.

7. Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- A Third Party Vendor Management Programme
- Compliance with the Modern Slavery Act of 2015
- Requiring our vendors certify their compliance with this Modern Slavery Statement

We have a dedicated compliance team, which consists of representatives from the following departments:

- Legal
- Finance
- Human Resources

8. 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 mandatory Modern Slavery training to our staff.