



MODERN SLAVERY ACT STATEMENT

iLOQ Oy (or the “Company”)

Last Modified: 16 June 2021

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Slavery and Human Trafficking Statement for iLOQ Ltd for the year ended 31 December 2020

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that iLOQ has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labor. iLOQ has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

iLOQ Ltd (iLOQ UK Ltd) is the primary UK subsidiary of iLOQ Ltd.

iLOQ is a growing Finnish company that is leading the technological revolution in the digital locking industry. iLOQ transforms mechanical locks into digital and mobile access management. iLOQ solutions are based on technologies developed and patented by the company, enabling electronic and mobile locking without batteries or cables. iLOQ replaces mechanical and electromechanical locking systems with environmentally friendly solutions that solve the problems of lost or copied keys, reduce lock maintenance and minimize lifecycle costs.

Our supply chain spans worldwide, and is present in all supporting local markets like the UK.

Our high-risk areas

iLOQ believes in responsible social and ethical behavior and has a responsibility to the people serving the company worldwide. People whose work contributes to the company's success should not be deprived of their basic human rights or be forced to suffer physically or mentally from their work.

iLOQ ensures all employees are paid in line with the local Government minimum wage guidelines and ensures all employees are treated fairly and awarded appropriately for their endeavors and not exploited in any way. All employees undergo reference checks, induction and training processes appropriate for their role within our business.

Furthermore, iLOQ, its employees and business partners have an obligation to all stakeholders to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine employee and customer trust. This is the foundation for and the reason why iLOQ has

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created the Code of Conduct, applicable not only to all iLOQ employees, but all suppliers and personnel working for and on behalf of iLOQ.

iLOQ sources goods and services directly from a global network of suppliers, including many based in low-cost countries. Our due diligence checks on external suppliers together with written confirmation that:

- they have read our supplier Code of Conduct
- no part of their business operations contradicts the Code of Conduct or other modern slavery legislation and guidelines
- they treat workers fairly and pay at least the prevailing minimum wage applicable within their country of operations

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility-to-work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
 - The purpose of this policy is to provide a framework for the recruitment and selection of personnel based on our principles and all other relevant employment legislation. All recruitments are to be conducted in a professional, ethical and fair manner, ensuring that the data privacy of candidates and compliance with local laws and regulations is met.
2. **Whistleblowing policy.** We operate a whistleblowing policy so that all employees and stakeholders know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. **Code of Conduct.** This code explains the manner in which we behave as an organization and how we expect our employees and suppliers to act.

Our suppliers

iLOQ operates a preferred supplier policy and maintains a supplier list. We conduct due diligence on suppliers before allowing them to become a preferred supplier. This due diligence can include online searches to ensure that particular organizations have never been convicted of offences relating to modern slavery and on-site audits which include a review of working conditions. Ongoing sustainability audits of our low-cost country suppliers are performed throughout the term of our relationship with them. Suppliers are asked to confirm that no part of their operations contradicts our supplier Code of Conduct which includes appropriate conduct in respect of modern slavery and human trafficking.

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The Supplier shall be committed to ethical conduct and respect for human rights in accordance with internationally recognized social and ethical standards, including compliance with international ethical standards e.g. SA8000.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their businesses
2. They hold their own suppliers to account over modern slavery
3. For international suppliers in low-cost countries, they pay their employees any prevailing minimum wage applicable within their country of operations
4. We may terminate our contract with them at any time should any instances of modern slavery become apparent

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

Responsibility for the statement

The iLOQ Management team has overall responsibility for ensuring policies and procedures comply with the iLOQ legal and ethical obligations and that all those under our control comply with them. The Chief Financial Officer of iLOQ has primary responsibility for overseeing the implementation of the iLOQ policies and procedures. This includes responsibility for the monitoring of their use and effectiveness and the updating of policies to reflect changes in legislation.

Management at all levels within iLOQ are responsible for ensuring that those reporting to them understand and comply with all relevant policies and procedures and are given adequate training on modern slavery.

iLOQ believes in social and environmental responsibility and ethical conduct and expects its employees and business partners to do the same. We continually work to improve our policies and procedures to enable us to continue to grow and develop with long-term sustainability and ethical conduct in mind. This also includes building sustainable and ethical relationships with our business partners.

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Approval

This statement was approved by the board of Directors of iLOQ at their meeting on xx month year and signed on its behalf by:

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