

## **Voluntary slavery and human trafficking statement**

IOOI Sp. z O.O. (trading as "Inqud") ([inqud.com](https://inqud.com)) is committed to improving our practices to combat modern slavery in our business by taking steps, as far as we are able, to ensure that our supply chains are free from slavery and human trafficking. This statement sets out the steps we have taken in 2023 to understand potential modern slavery risks within our business structure and supply chain and the steps taken to eradicate these risks.

### **About us**

We are a Lithuanian business providing wallet and exchange services in the cryptocurrency sector.

Despite we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act 2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to identify risks and tackle modern slavery and human trafficking in our business and in our supply chains.

Our supply chains are based around the world and include direct suppliers (such as web and software developers, and liquidity providers) and indirect suppliers (such as professional services, sales and marketing agencies)

### **Our Actions**

As a company committed to equal opportunities, we are fostering a non-discriminatory and respectful working environment for our staff. We encourage all employees to report any wrongdoing without fear of reprisal and to facilitate this, we have a comprehensive whistleblowing policy accessible to all staff members on our intranet, alongside other company policies.

We maintain a strict policy against establishing business relationships with organizations abroad, that knowingly support or are involved in slavery, servitude, and forced or compulsory labor.

While most of our supply chain operates on their terms and conditions, we ensure that new or renewing contracts incorporate provisions related to modern slavery and anti-bribery practices. This ensures that our commitment to ethical practices is extended throughout our business relationships.

### **Due diligence and risk assessment**

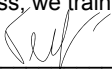
To help identify and monitor the risk of slavery and human trafficking in our supply chain we conduct the following:

- **Supply Chain Mapping:** we conduct a comprehensive mapping of our supply chain to identify all suppliers and subcontractors involved. Understand the geographical locations and countries of operation.
- **Risk Profiling:** we evaluate suppliers and subcontractors based on their geographical locations, industry, and the nature of their operations. Then we identify high-risk areas or sectors where slavery and human trafficking are more prevalent.
- **Supplier Questionnaires and Audits:** we develop detailed questionnaires to assess suppliers' labor practices, employment policies, and compliance with human rights standards. Also, we conduct regular audits of high-risk suppliers to ensure compliance and identify potential issues.
- **Code of Conduct and Supplier Agreements:** IOOI Sp. z O.O. implements a clear and robust code of conduct that explicitly prohibits slavery and human trafficking within our supply chain. That covers the inclusion of clauses in agreements requiring compliance with anti-slavery and human trafficking laws.
- **Training and Awareness:** we educate employees, suppliers, and contractors about the risks of slavery and human trafficking, as well as the company's zero-tolerance policy. That raises awareness about the indicators of exploitation and how to report concerns.
- **Collaboration and Engagement:** we collaborate with industry peers, NGOs, and other stakeholders to share best practices and enhance collective efforts to combat slavery and human trafficking.
- **Regular Monitoring and Reporting:** we continuously monitor supplier performance and compliance with anti-slavery measures. Regularly report on progress, challenges, and improvements made to address slavery and human trafficking risks.

By implementing these due diligence and risk assessment measures, we can proactively identify and address potential risks of slavery and human trafficking within our operations and supply chains, contributing to a more ethical and responsible business environment.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business, we train our staff.

  
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Director

IOOI Sp. z O.O.

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