



ORBIC North America LLC, Modern Slavery Statement

Introduction

At Orbic we are committed to ensuring modern slavery does not exist in its organisation or supply chains. We constantly strive to develop policy and procedures to manage the way we obtain our goods and services to keep our supply chains robust. To date we have had no reports of modern slavery within our organisation nor our supply chains.

Group Structure & Business

Orbic North America LLC is a global full line manufacturer-Smartphones, Tablets, Hotspots, Laptops, cloud services and Wearables.

Headquartered in Bay Shore Long Island, NY with offices in Puerto Rico, India, Taiwan, China, Australia, Japan & Germany

Our Supply Chain

The Company uses a central procurement process managed internally which trades within thousands of suppliers across multiple countries and is firmly committed to taking steps to uncover any potential risks within its supply chain.

Our Policies

Orbic North America LLC has various policies in place which aim to minimize the risk of modern slavery or human trafficking, We respect human rights, we respect the right to freedom, we don't use child labour or forced labour and encourage reporting of any related concerns, including:

- **A Robust Procurement Policy.** In addition to the rigorous supplier assessment processes, the Company implemented an additional questionnaire focused on modern slavery activities/signals. The questionnaire is deployed on a risk basis, according to the nature of services provided.
- Suppliers are required to report what steps they are taking regarding identifying the risk of modern slavery within their particular supply chain which will allow the Company to better assess the potential risks of modern slavery, forced or child labour, human trafficking or forced violation of human rights in its own supply chain.
- The Company includes a specific requirement for compliance with modern slavery legislation in its standard terms and conditions and contracting agreements.
- **Vendor Management Program and Policy** defining, managing, Vendor Risk, including:
 - How to identify vendor risk
 - How to mitigate vendor risk
 - How to monitor vendor risk
 - Who to contact for assistance
- **Orbic North America LLC** , Code of Conduct, is a significant part of Orbic's culture and makes clear that Orbic conducts business consistent with the highest ethical and



professional standards and will not tolerate behaviour that deviates from those standards. Colleagues are expected to act with integrity, honesty, courage and promote mutual respect.

- **Speak Up Policy** Respect and a culture of openness in the workplace is a key aspect of the Orbic North America LLC, Code of Conduct. Orbic encourages colleagues and other business partners to report any concerns, including concerns relating to modern slavery, forced or child labour, human trafficking or forced violation of human rights.

Training

The Company's Modern Slavery Policy has been rolled out to all personnel, especial staff most likely to engage supply chains with a potentially higher risk of encountering modern slavery, and incorporated into induction training. It includes information on who staff should contact should they have any concerns.

Company staff are encouraged to report any concerns or suspicions regarding the presence of modern slavery, forced or child labour, or forced violation of human rights within the supply chain.