

## **RADIAL SUPPLY CHAIN TRANSPARENCY STATEMENT**

Radial Commerce Limited (the "**Company**" or "**Radial**") is a responsible and ethical business which is committed to employing and engaging our workers in accordance with applicable laws including the Modern Slavery Act 2015 (the "**Act**"). Modern slavery is a criminal offence under the Act and an abuse of human rights. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking. These modern slavery crimes seek to deprive a person of his or her liberty by exploiting them for personal or commercial gain through the provision of a job. We are also committed to ensuring that our suppliers and subcontractors employ and engage their own personnel in accordance with applicable laws and also in accordance with the principles of the Act. This Supply Chain Transparency Statement (the "**Statement**") is produced in accordance with Section 54 of Act. Radial may update this Statement as required.

This Statement has been approved by the board of Directors of the Company. The board of Directors stands firmly behind the principles in our Policy and this Statement and reiterates our commitment to preventing modern slavery.

### **1. About Radial**

Radial Commerce Limited is one of several affiliated ecommerce companies wholly owned by Radial Holdings, L.P. a United States Limited Partnership. Radial is a leader in omnichannel commerce technology and operations, enabling brands and retailers to profitably exceed retail customer expectations. Radial's technical, powerful omnichannel solutions connect supply and demand through efficient fulfillment and transportation options, intelligent fraud, payments, and tax systems and personalized customer care services. Hundreds of retailers and brands confidently partner with Radial to simplify their post-click commerce and improve their customer experiences. Radial brings flexibility and scalability to their supply chains and optimizes how, when and where orders go from desire to delivery.

Our UK business engages suppliers and subcontractors predominantly by our fulfilment and customer care operations. We use tried and tested suppliers and subcontractors with good reputations within the business and with similar corporate values as Radial.

### **2. Our Slavery and Human Trafficking Policy**

We have issued a Slavery and Human Trafficking Policy (the "**Policy**") that sets out our commitment to good business ethics and the prevention of modern slavery within our business and our supply chains.

### **3. Our Supply Chains**

We engage suppliers and subcontractors for the following goods or services:

- Delivery and courier services;
- Software and technology vendors;
- Staffing agencies;
- Office equipment and packing suppliers; and
- Utility providers

#### **4. Our diligence and Contractual Requirements**

To the extent necessary, we will amend existing supplier and subcontractor agreements to include obligations to adhere to the principles of the Policy and the Company's rights to audit their business operations where we reasonably suspect a breach of our Policy. We take reasonable precautions when engaging suppliers and subcontractors in commonly known high-risk jurisdictions. We engage with all of our suppliers and subcontractors regarding modern slavery issues to understand better the steps they have taken to prevent modern slavery in their businesses.


#### **5. Audits**

We will, where necessary, introduce the right to audit any supplier or subcontractor where we have concerns regarding modern slavery. In this event, a supplier or subcontractor will be selected for an independent audit. As part of such audit, we appoint independent auditors who evaluate working conditions and who are trained and knowledgeable about local laws and culture to assess whether there is a modern slavery breach within their business. We then take steps to either rehabilitate the supplier or subcontractor or to minimise the risk to our supply chain.

#### **6. Employee Awareness**

Our employees will be made aware of this Policy and will be obliged to comply with its terms. If an employee engages in modern slavery or facilitates another person to engage in modern slavery in relation to his or her duties for the Company, this may constitute gross misconduct for which the employee may be dismissed without notice.

**This Statement has been approved by the board of the Company.**

  
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Director

12.12.17  
Date