

Modern Slavery Statement

July 2022

Modern Slavery and Human Trafficking Statement 2022

This is the Onfido UK Limited modern slavery and human trafficking statement for the financial year ending 31 January 2022 (the “Reporting Period”). This statement has been produced to present the steps taken to prevent modern slavery and human trafficking in our business and supply chains, as well as demonstrate full compliance with section 54 of the Modern Slavery Act 2015 (the “Act”). It has been approved by the Board of Directors of Onfido UK Limited as of 29 July 2022.

Our Values

“In line with our [company values](#), Onfido is strongly committed to conducting our business operations in an ethically responsible manner. Onfido takes our responsibilities to all our stakeholders (customers, partners, staff, suppliers, communities) very seriously. This includes our commitments to treat all workers with respect and dignity, to uphold all human and employee rights, and to ensure safe working conditions, both within our business and in our supply chains. As part of our overall commitment to supporting human rights, Onfido does not tolerate illegal or inhumane labour practices, including slavery, servitude, forced or compulsory labour and human trafficking.”

Review

This is Onfido’s second published statement. We intend to review this statement on an annual basis in line with the requirements of the Act, and update it based on our continuous improvements to our policies and processes, working alongside our long-term strategic partners to ensure modern slavery plays no part in our business or supply chain.



Onfido's Business, Organisational Structure and Supply Chain

Onfido's Business

Onfido is the new identity standard for the internet. We empower people around the globe to reach services they love and need simply, speedily and safely – whether they're renting a car or opening a bank account or completing a high-value transaction where identity is key. We built a full-service suite of AI-powered identity verification solutions with fairness and inclusiveness at their core, and were awarded 'Outstanding Leader in Accessibility' and 'Best Innovation in Algorithmic Bias Mitigation' awards at CogX.

Onfido is an established pre-IPO technology company with a prominent position in the global marketplace that has been repeatedly recognized for excellence in performance and innovation. In 2021 we were awarded 'Artificial Intelligence and Machine Learning Hot Company' by CyberDefense Global Infosec Awards, 'Fraud Prevention Innovation of the Year' at the CyberSecurity Breakthrough Awards, and named to the CB Insights Fintech 250 for the fourth year running. We've received over \$200 million in funding from investors including TPG Growth, Microsoft, and Salesforce to achieve our vision. We partner with thousands of businesses to help millions access services every week – from billion dollar institutions to hyper growth unicorns. We support identities from 195 countries, and 2,500+ document types. Our recent growth is fuelled by continued increasing demand in the United States – where we've grown in year-over-year sales by 264% – as more enterprise organisations accelerate their digital transformation plans with Onfido.

Our goal is to work together to promote and celebrate an inclusive and diverse community. Collectively, all staff are committed to creating an environment where everyone can be themselves, and where differences are celebrated. We encourage people from all backgrounds and cultures to come together to solve some of the world's most interesting problems.

Onfido Group Structure

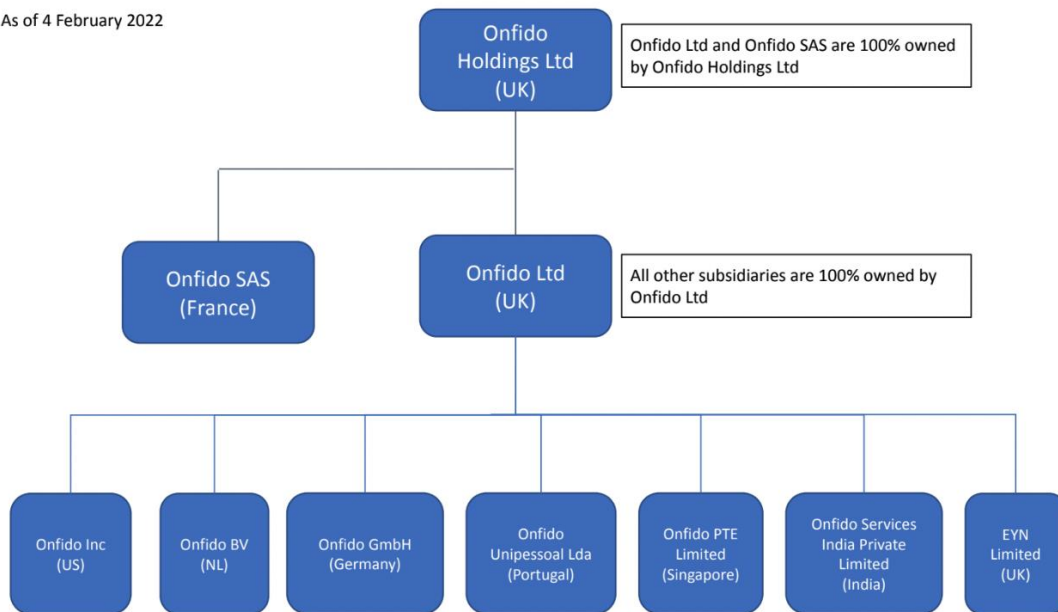
Onfido UK Limited is a private limited company incorporated in England and Wales. It is the immediate parent company for the Onfido group ("Onfido Group") subsidiaries in the UK, USA, India, Singapore, Portugal, Netherlands, and Germany. Onfido UK Limited is also the principal trading entity within the Onfido Group. As per the Modern Slavery Act 2015, Onfido UK Limited (and its subsidiaries) fall within the scope of the Act and also this Statement.

Onfido Holdings Limited is the Onfido Group holding company and ultimate parent entity, established in 2021 for this purpose. Onfido SAS (France) is a subsidiary of Onfido Holdings Limited. The Onfido Holdings Limited Board of Directors are responsible for oversight and direction of the Onfido group ("Group"), and the Onfido UK Limited Board of Directors are responsible for oversight and direction of the Onfido subsidiaries, other than Onfido SAS (France).

Onfido UK Limited has prepared this statement, as per the provisions of the Modern Slavery Act 2015, to present the measures undertaken by Onfido UK Limited and its subsidiaries to prevent modern slavery and human trafficking in our business and supply chains. Although, in line with the provisions of the Modern Slavery Act 2015, Onfido SAS (France) and Onfido Holdings Limited fall outside the scope of this Statement, the measures described herein are operated consistently across the Group.

Please see the below Onfido Group Structure diagram below for a visual representation:

As of 4 February 2022



Responsibility

The Onfido Limited Board (“The Board”) is responsible for overseeing Onfido Limited’s (“Onfido”) compliance and corporate responsibility, and has discretion to delegate a broad range of powers and decisions to the Executive Team in order to manage Onfido’s business on a daily basis.

The Executive Team designs policies and communications so that employees understand Onfido’s objectives, know how their individual actions interrelate and contribute to those objectives, and recognise how and for what they will be held accountable. Management places an emphasis on maintaining comprehensive, relevant internal controls and on communicating the high integrity and ethical values expected of Onfido’s personnel.

All staff throughout Onfido have responsibility for adhering to the standards set out in this statement.

Onfido’s Supply Chain

Onfido procures many different goods and services from a range of suppliers, the large majority of which are based in advanced OECD countries - mainly the UK, USA and in Europe. These include:

- partner software services used as part of our product / service provision to our customers;
- business process outsourcers with whom Onfido subcontracts part of our service provision to our customers;
- office-based services, including office supplies, maintenance and cleaning services;
- the purchase of IT hardware and software;
- travel management and the hire of venues on a global basis for company events;
- branding and marketing of our products and services;
- contractors and temporary staff;
- staff training and professional subscriptions / memberships, and
- professional services of advisors such as lawyers and auditors.

Whilst our risk assessment indicates we generally procure products or services in low-risk geographies and industry verticals, we recognise that no business is immune to the complex supply chain risk posed by modern slavery. Onfido also expects the same standards from our suppliers as we apply internally, including a zero-tolerance approach to modern slavery.

We therefore operate internal measures and work in strong collaboration with our global supply chain partners to develop robust and long-term solutions to this issue, in order to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place. This includes the requirement for suppliers to agree to adhere to all applicable laws.

Supplier Review Process

Onfido follows a risk-based approach to supply chain risk, which is based upon suppliers'

- country risk i.e. suppliers in countries where slavery is more prevalent based on the Global Slavery Index; and
- industry risk i.e. some industries in which we procure products or services are more vulnerable to slavery than others.

As part of our supplier selection and renewals process we require completion of a questionnaire that includes a section relating to the adherence to the Act.

This supplier questionnaire is also periodically reperformed, typically on an annual basis, for our largest or higher-risk suppliers.

Where suppliers operate in higher risk geographies or industries, we also perform additional due diligence at the onboarding and renewals stages, as well as exercising additional ongoing monitoring, in order to identify, prevent, and address risks.

We consistently work with areas of the business which have been identified as higher relative risk to establish further steps that we can take, and are taking, to strengthen our approach and to ensure good working practices. This includes annual audits of relevant hiring practices at our business process outsourcing partners.

Onfido's Policies Relevant to Slavery and Human Trafficking

Onfido has published a number of policies covering all aspects of our business, in order to outline expectations and requirements of staff (permanent or otherwise). Company policies are openly available to employees via intranet or via Share Drive.

Anti-Modern Slavery

- This statement reflects and confirms our opposition to modern slavery and human trafficking.
- In instances where we were to identify any such cases, we have prepared a response template to enable a swift and thorough response. In such cases, we would assess the facts, consider the need for immediate external notification (such as to emergency services), and then take any steps to prevent reoccurrence, including working with the impacted supplier and any other third parties (NGOs, government agencies, law enforcement etc.) to provide training, support, guidance and incentives to implement policies and tackle the issue.
- If this is not sufficient to address any instances of coercion, threat, abuse or exploitation to our satisfaction within acceptable timeframes, and in line with Onfido's zero tolerance approach to Modern Slavery, Onfido would strongly consider termination of any suppliers found to be carrying out modern slavery.

Supplier Management

- Onfido's Procurement team has defined and documented Onfido's procurement and supplier management processes in the company External Party Management Policy. This policy is reviewed annually with assistance from the Risk & Compliance team, and ensures that supplier selection and management are performed in a controlled manner involving a holistic risk assessment following a risk-based approach.

Recruitment

- Onfido's People team have defined the employee onboarding process in a number of policies, including the Pre-Employment Screening Policy which describes the process for conducting pre-employment right to work background checks.

Whistleblowing

- Onfido's Whistleblowing Policy is in place to encourage our employees to report any concerns with non-compliance with legislation, including within our supply chains, and to ensure the protection of whistleblowers. Our Whistleblowing Policy explicitly identifies modern slavery and slavery-like practices as within the scope of Onfido's whistleblowing process, and



provides internal and external escalation contacts for any identified instances of wrongdoing.

Disciplinary Policy

- As documented within the Disciplinary Policy, minor breaches of policies result in informal disciplinary action. Instances of serious or gross misconduct as defined in the policy result in formal disciplinary action.

Employee Protection

Onfido is committed to ensuring that employee right to work checks are carried out consistently and diligently in line with current relevant legislation. Official documentation that must be checked by us as an employer in order to prevent illegal working is copied and retained on the employee file, with annual audits carried out to ensure that we remain compliant globally with right to work requirements. Alongside this, Onfido also performs additional background checks on prospective employees depending on security and customer requirements.

All Onfido employees are able to freely enter into employment with Onfido, and are thereafter provided with employment contracts confirming the full terms and conditions of the employment relationship, including employee rights.

Onfido operates a number of policies to demonstrate our commitment to employee protection: (including but not limited to)

- Disciplinary Policy;
- Grievance Policy;
- Anti-Bullying, Harassment & Victimisation Policy;
- Equal Opportunities Policy;
- Flexible Working Policy;
- Paid and Unpaid Career Breaks Policy;
- Sickness Absence Policy, &
- Family Friendly Policy.

Training and development

All new joiners are required to complete Code of Conduct training as part of onboarding; employees are also required to re-sit the training annually. The Code of Conduct training includes provisions for the identification, reporting and zero-tolerance approach to Modern Slavery, as well as covering Onfido's company values and ethical expectations of employees.

Monitoring Our Effectiveness in Eliminating Modern Slavery and Human Trafficking

Through our review processes as well as in the normal course of business, no instances of modern slavery within our direct organisation or suppliers have come to our attention. However we remain vigilant, particular over suppliers in geographical areas or industries identified as higher risk for modern slavery or human trafficking. We will continue to monitor the effectiveness of the measures



we take in order to ensure there is no modern slavery or human trafficking taking place in any part of our organisation or supply chains. Our effectiveness monitoring efforts include: (but are not limited to)

- Monitoring completion rates of our Code of Conduct training by employees;
- Monitoring whistleblowing reports for instances of reported modern slavery and human trafficking;
- Monitoring completion of, and reviewing responses to, supplier risk assessment questionnaires;
- Reviewing responses to annual risk assessment questionnaires from our largest and highest-risk suppliers;
- Performing risk and compliance audits at our business process outsourcing partners, including reviewing staff hiring and training processes, and agreeing corrective action plans where required;
- Subscribing to, and monitoring alerts from, automated commercial data feeds for our highest-risk suppliers in order to stay abreast of any reported compliance breaches;
- Auditing our own compliance with our own recruitment and onboarding policies; and
- Monitoring our compliance with the UK Modern Slavery Act.

Our Continued Work

- We will review our processes, policies and this statement at least annually, and whenever required for any other reason.

Signature

29 July 2022

DATE

July 2022

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Francesca Porter
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Francesca Porter, General Counsel &
Company Secretary