



Multinational Modern Slavery Statement

25th March 2024

Introduction

This statement has been published in accordance with the UK Modern Slavery Act (2015) and the Australia Modern Slavery Act (2018) for the financial year ending 31 December 2023. This statement outlines the steps taken by Magnit Corporation and its subsidiaries (collectively, “Magnit”) to prevent modern slavery and human trafficking in its business and supply chains. This statement covers all Magnit subsidiaries inclusive of the UK (Magnit Global UK Ltd, Magnit Global UK WFQ Limited, Magnit Global UK GRI Limited, Magnit Global UK GRI IP Limited, Magnit Global UK Bidco Limited) and Australia (Magnit Global Australia GRI Pty Ltd, Magnit Global Australia Pty Ltd) as all entities utilize Magnit’s global policies, procedures, and governance processes, which are designed to combat modern slavery and promote ethical practices.

This statement is updated every year no later than June 30th, six months following our financial year end. This statement has been approved by the Board of Directors for Magnit, LLC on 25th March, 2024.

Who We Are, Structure, Operations, and Supply Chain

Magnit is a global provider of contingent workforce management and partner ecosystem supported by data, software, intelligence, and services to meet its clients’ workforce needs. Magnit has helped global brands and organizations achieve operational and financial success for more than 30 years. Magnit respects and supports the protection of human rights in its operations and supply chain. Magnit is also committed to upholding the International Labour Organization’s Core Conventions on labour rights and support the United Nations’ Guiding Principles on Business and Human Rights.

Magnit EMEA UK Ltd, Magnit UK WFQ Limited, Magnit UK GRI Limited, Magnit UK GRI IP Limited, Magnit UK Bidco Limited, Magnit Australia GRI Pty Ltd, and Magnit APAC Australia Pty Ltd are subsidiaries of Magnit Corporation. Further information for each entity may be found at www.magnitglobal.com.

Magnit’s global supply chain can be divided in three segments: (1) suppliers of contingent labour resources, such as temporary staffing agencies, who provide workers for our clients; (2) client-sourced professional workers who are employed by Magnit to provide services to our clients; (3) independent contractors and services procurement vendors providing services to our clients; and (4) vendors who supply goods and services to Magnit itself.

Magnit operates a robust consultation process during our annual ethical reporting period with all Magnit subsidiaries to ensure consistent ethical practices are implemented within the supply chain globally. To maintain alignment of ethical practices, Magnit adheres to a continuous training and reporting regime whereby the reporting entity assesses the effectiveness of our policies within each subsidiary in accordance with local and global labour standards.

Risks of Modern Slavery

Magnit provides services in over 65 countries world-wide, however, Magnit does not engage workers in any of the “high-risk” jurisdictions for the purposes of protection against the associated risks of Modern Slavery within our supply chain.

Given the nature of Magnit’s services, Magnit does not operate in most of the sectors designated as “high risk” by the Global Slavery Index 2018. Notwithstanding, Magnit acknowledges that it engages with suppliers working within the service industry based in the UK. Given the breadth of these operations, Magnit recognizes the potential risk that elements of the supply chain are engaging in modern slavery practices. Magnit implements extensive policy and operational controls to irradicate the potential risk within high-risk sectors and expanding jurisdictions.

Relevant Policies and Training

Magnit is committed to respecting and promoting international human rights throughout our global business. We understand the importance of both protecting and also promoting fundamental principles and rights at work. Our standard practices are designed to protect these rights during the life cycle of all worker engagements.

Code of Business Conduct and Ethics

Our Code of Business Conduct and Ethics provides guidance to all of our colleagues on the conduct of our business according to the highest ethical standards. We provide compulsory annual training on our internal Cornerstone platform to all Magnit employees, as well as additional regular guidance and training to support the understanding of our business expectations in their standard of business conduct and promote continual professional development within the Magnit community.

Our business has realised its continual growth through partnering with our customers and supply partners in an ethical, transparent, integral, and honest culture. Our policies and training regimes educate our employees on the key modern slavery indicators and encourage all employees to all report any ethical concerns, including modern slavery risks, using our anonymous Whistleb platform, to ensure all concerns are raised, investigated and addressed without the fear of repercussions.

Supplier Code of Conduct

Magnit maintains policies and procedures related to recruitment and procurement activities it carries out to ensure that our ethical standards are implemented throughout the supply chain, as outlined in our Supplier Code of Conduct. Our Supplier Code of Conduct is communicated to all Magnit Suppliers at the onboarding stage and provides guidance on the expected ethical standards in conducting their business operations.

To ensure our ethical standards of practice are maintained throughout our supply chains Magnit performs annual compliance auditing on our suppliers, along with enhanced review procedures which will be implemented for any operation or element of service conducted in a high-risk sector or global jurisdiction. Magnit reserves the right to discontinue the relationship with any supplier or Magnit partner for failure to adhere to our expected Code of Conduct.

Our Supplier Code of Conduct addresses the following ethical practice areas and can be accessed [here](#):

- Anti-Bribery & Corruption
- Supplier Gift Acceptance Policy
- Data Privacy & Cyber Security

- Diversity and Inclusion
- Human Rights and Labor Standards
- Modern Slavery
- Health and Safety
- Sustainability

Modern Slavery Policy

Our Modern Slavery Policy provides guidance to all of our colleagues, clients and suppliers on how the Magnit Group deal with Modern Slavery and the risks to look out for. This forms part of the regular training to support employees and suppliers. Our policy encourages employees to identify and report any ethical issues, including modern slavery risks, through its open-door policy without fear of negative repercussions, through our confidential Whistleb reporting links.

Monitoring Risk and Compliance, Due Diligence Processes, Risk Assessment and Management

We maintain a zero-tolerance policy to slavery and human trafficking and expect all those in our supply chain to comply with our values. We work to ensure that our contingent workforce is sourced ethically, fairly, and in line with our business values. Accordingly, we: (1) verify the identity of all workers we supply directly to our clients, and their right to work in the jurisdiction where they provide services; (2) seek positive assurances that suppliers are compliant with all relevant legislation and audit using a risk based approach; and (3) regularly review all suppliers to ensure they are adhering to their commitment to our supply policies and sharing our commitment to the UK and Australia Modern Slavery Acts.

We also regularly ensure that our standard supplier contract templates establish minimum contractual expectations for our suppliers which better allows us to understand our supply chain and promote more ethical behaviour. Magnit recognizes and understands that supply chains are expansive, extending far beyond those entities with whom Magnit conducts business, which raises the risk for modern slavery. As such, Magnit seeks to provide greater transparency about how it identifies and addresses the risk of modern slavery in business operations and supply chains as we move forward allowing for our policies and systems to continually improve and grow as we adapt and learn more about our supply chain.

Control Measures

Magnit operates an enhanced due diligence process for the onboarding of suppliers, inclusive of onboarding questionnaires, compliance screening services, the Supplier Code of Conduct and the provision of educational communications. All our global suppliers have access to and are encouraged to utilize the support function, education and training material provided by the Whistleb platform to obtain regular information pertaining to ethical conduct.

Our onboarding processes equip Magnit with the appropriate visibility to identify high-risk and potentially non-compliant suppliers prior to implementation, to eradicate the risk of modern slavery within our global supply chains.

Commitment to Continuous Improvement

Magnit is dedicated to continuous improvement and maintenance of a zero-tolerance approach to modern slavery in our global organization and supply chains. To assess the effectiveness of our approach, Magnit continuously analyzes a number of measurable metrics using our Whistleb and Cornerstone platforms.

Magnit will perform regular analysis on the below performance indicators:

- The number of recorded reports made to the business via the reporting channels
- The number of investigations undertaken
- The number of identified cases of modern slavery
- The number of employees trained on modern slavery

Whistleb Platform and Reporting

Magnit utilizes the Whistleb global solution, an impartial external party providing dedicated case managers to thoroughly investigate the merits of each incident report. Whistleb's whistleblowing service allows users to anonymously sound the alarm for suspected wrongdoings affecting people, Magnit's organisation, society, or the environment. Magnit believes utilization of an impartial third-party provides additional security and assurance in respect of the safeguarding of anonymity of the reporting party, which in turn, promotes diligent ethical practices.

Magnit's anonymous reporting channel can be accessed [here](#).

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Teresa Carroll, Chief Executive Officer

Date 01 April 2024