

Anti-Slavery & Human Trafficking Policy

1: Policy Statement and Commitment

Novo idea Software Ltd. and its affiliates companies (collectively, the “**Group**”) are committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers. The management of the Group, in their determination, resolute that no element of the supply chain nor the delivery of client services be utilised by third party criminal elements intent on profiting from the exploitation of human life. This policy sets out the Group's approach and responsibilities in relation to anti-slavery and human trafficking.

To ensure clarity, for the purposes of this policy, "affiliates" means any entity directly or indirectly controlled by Novo idea Software Ltd., including subsidiaries and joint ventures in which Novo idea Software Ltd. has a controlling interest.

2: Structure of the organisation

We are part of the Group, whose ultimate parent company is Novo Idea Software Ltd. The Group's head office is located in Israel. The Group's employees and contractors are delivering its services worldwide and operates out of offices in the United Kingdom, the United States, and Israel.

In order to provide our services, we work with a range of suppliers that support our technology infrastructure, professional services, and operational needs.

3: Our Commitment

As part of our commitment to combating modern slavery, the Group has implemented this Anti-Slavery & Human Trafficking Policy, which applies to all employees, officers, consultants, contractors, suppliers, and any other persons associated with Group. This policy forms part of our Employee Handbook and is applicable generally within the business when dealing with suppliers and customers.

We are resolute in our stance against any form of exploitation and expressly state the following:

- We don't use, and will not tolerate the use of, forced labor bonded labor, human trafficking, or child labor in any of our operations.
- We comply with employment and labor laws in every jurisdiction in which we operate, and are committed to promoting a safe, fair, and respectful workplace for all personnel.
- We expect the same high standards from our suppliers, contractors, and other business partners, and we require their adherence to this policy. In addition, we make sure our suppliers are aware of this policy and require them to adhere to the same high standards.

4: Due Diligence Procedures

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted a due diligence audit procedure. We are endeavouring to go beyond any applicable statutory requirements in order to reduce or eradicate the possibility that any part of the Group could inadvertently be used in modern slavery or human trafficking.

Our due diligence procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

5: Risk Assessment and Compliance

The Group regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by carrying out audits to identify and manage any areas of risk, and by maintaining ongoing risk assessments.

The Group does not consider that it operates in high risk sectors or locations because it provides IT professionals and software solutions to the insurance sector.

We require all our suppliers to adhere to this Anti-Slavery & Human Trafficking Policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with this policy, we will immediately seek to terminate our relationship with the relevant supplier.

6: Monitoring, Review, and KPIs

The Group monitors on an annual basis how effective it has been in ensuring that slavery and human trafficking are not taking place in any part of its business or supply chains by developing and reviewing key performance indicators, the effectiveness of which can be monitored.

7: Training and Awareness

The Group invests in educating its staff to recognise the risks of modern slavery and human trafficking in its business and supply chains. Through training programmes, employees are encouraged to identify and report any potential breaches of this policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from the Group's business and supply chains.

8: Further Actions, Review, and Policy Governance

Following our review of our actions each financial year to prevent slavery or human trafficking from occurring in our business or supply chains, the Group will continue to monitor compliance with this policy and consider additional measures as appropriate to strengthen our framework. This policy will be reviewed annually and updated as necessary to reflect changes in legislation, best practice, or organisational requirements.

If the Group identifies or suspects a case of modern slavery or human trafficking in its operations or supply chain, it will take prompt action to investigate, implement remediation measures, and cooperate fully with law enforcement or relevant authorities. The Group will also review its procedures to prevent recurrence.

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Roi Agababa

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