

Expana Modern Slavery and Human Trafficking Statement

Updated June 2024

Introduction from the CEO

Modern slavery – commonly called ‘slavery’, ‘child labour’ and/or ‘human-trafficking’ – is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. These are heinous activities that we will never engage in or condone as a business, and that we condemn in others who engage in them.

We have a zero-tolerance approach to modern slavery and will not engage in business of any description with any business who does so. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Organisation's structure

Expana, together with its subsidiary and group entities, are providers of global commodity price data, price forecasts & market intelligence for the food, CPG and capital goods supply chains sectors. These services are predominantly served by way of a Software-as-a-Service (“SaaS”) platform.

Expana is primarily comprised of Mintec Limited, Mintec Inc (based in the United States), Mintec Europe A/S (based in Denmark), Mintec SAS (based in France), and AgriBriefing Limited (based in the UK), who owns our AgriBriefing, Urner Barry, GDS and Tallage entities.

Expana is ultimately owned and controlled by (i) an investment fund operated Five Arrows Principal Investments and (ii) investment funds operated by Synova. The Group has over 300 employees worldwide.

Our supply chains

Expana is predominantly a SaaS data business. With that in mind, our supply chains are limited in number and scope. Our primary suppliers are third-party suppliers of (i) commodity price data and (ii) computer software and hardware. We do not trade in physical goods.

Our policies on slavery and human trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our Modern-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human

trafficking is not taking place anywhere in our supply chains. We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Corporate Social Responsibility Policy; and
- Anti-bribery and Corruption Policy.

Employee Handbook and employees

Our Employee Handbook forms the foundation of our ethical business framework. It provides our people with the guidance and support necessary to carry out their work in the right way. We designed our Handbook to help our people understand Expana's core values and the behaviours which underpin them.

All of our employees undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks.

Whistleblowing

We encourage our employees and suppliers to report any concerns about unlawful conduct that they suspect is taking place. This includes any concerns regarding the risk of fraud, misconduct or wrongdoing (including but not limited to slavery or human trafficking). Our Whistleblowing policy provides our employees with the ability to report suspected wrongdoing. This service enables concerns to be reported with the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made such a disclosure.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a dedicated compliance team, which consists of involvement from the following departments:

- Legal;
- Audit and compliance;
- Human resources;
- Procurement; and
- Sales.

We expect our suppliers to comply with all applicable laws and regulations, and demand the same undertakings from them within our contract terms.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

Our effectiveness in combating slavery and human trafficking

We are using a number of KPIs (key performance indicators) to measure how effective we have been in communicating awareness of our policies and procedures related to the requirements of the Modern Slavery Act. The KPI's used to measure against will be subject to ongoing review by the Board to ensure their continued effectiveness.

Our commitment

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Expana's slavery and human trafficking statement for the financial year ending 31st December 2023 as approved by the Board of Directors.

Spencer Wicks
CEO, Expana