

# ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Reporting Year 2019

### INTRODUCTION

This Anti-Slavery and Human Trafficking Statement (“Statement”) has been published in accordance with the **United Kingdom Modern Slavery Act (MSA)** of 2015, the **California Transparency in Supply Chains Act** of 2010, and the revised **United States Federal Acquisition Regulation (FAR) 52.222-50** “Combating Trafficking in Persons” and the new FAR provision 52.222-56 “Certification Regarding Trafficking in Persons Compliance Plan.”

Slavery, servitude, forced labor and human trafficking are global issues found in every region of the world and are of increasing global concern. GreenSoft Technology, Inc. (“GreenSoft”) has zero tolerance for any form of forced labor or human trafficking in our workplace, supply chain or other operational units. GreenSoft is committed to protecting the rights of workers in our operations and adhering to an Anti-Slavery and Human Trafficking Policy that reduces the possibility of violations in our operations or supply chain.

### STRUCTURE AND SUPPLY CHAINS

GreenSoft is a leading provider of data services and software to help companies comply with global environmental product regulations. GreenSoft’s customers are typically electronics or other product manufacturers.

GreenSoft is headquartered in Pasadena, California, where senior management and executives are located. GreenSoft also has offices in Europe, Israel, Japan, Taiwan, and China. GreenSoft’s office in China contains our data collection center. GreenSoft has 145 employees in total throughout all offices. GreenSoft employees and policies are managed by GreenSoft’s President.

Because GreenSoft supplies services and electronic software rather than a physical product, we do not purchase parts from a supply chain or have any manufacturing operations.

### POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

GreenSoft’s internal Code of Conduct incorporates anti-slavery and human trafficking provisions as well as violation reporting and whistleblowing provisions. The Code of Conduct policy is mandatory and extends to every individual working on behalf of GreenSoft.

The policy requires that all work performed must be voluntary and not done under any threat of penalties, sanctions or violence. Indentured labor is prohibited and workers are free to leave work at any time, with all salary owed to be paid. All workers are required to report suspected breaches of the policy to management and shall not face retaliation for doing so. Child and migrant labor are included in the protections of the Code of Conduct policy.

The Code of Conduct and this Statement is issued to all employees at the start of their employment with GreenSoft. Employees must sign acknowledgement of receipt and understanding of the Code of Conduct and the Statement. The Code of Conduct provides employees with information on how to report issues to the Global Human Trafficking Hotline.

## DUE DILIGENCE PROCESS IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

The biggest exposure risk to slavery and human trafficking for organizations is in the product supply chains and organizational units outside of the organization's direct operation. GreenSoft has a reduced risk in this regard because we do not have a supply chain or a physical product that is manufactured.

Therefore, our internal risk assessment finds that GreenSoft's biggest slavery and human trafficking risk is our China office. GreenSoft has taken steps to reduce the risk or potential for slavery and human trafficking in our China office by embedding respect for human rights and zero tolerance of modern slavery into our Code of Conduct that all employees must sign at the start of their employment with GreenSoft.

GreenSoft's President, located in the Pasadena, CA USA office, visits the China office at a minimum of twice per year to monitor and evaluate the measures in place in regards to key performance indicators, adherence to the Code of Conduct and Anti-Slavery and Human Trafficking Policy. Employees are able to report violations and/or engage with management in English or Chinese.

The impact and risk assessment performed by GreenSoft's President includes engagement with employees at all levels within the China office and communication with employees on the risk, policy and reporting mechanisms related to modern slavery and human trafficking. Additionally, management-level employees have undergone anti-slavery and human trafficking training, detailed below in this Statement.

## EFFECTIVE ACTION TAKEN TO ADDRESS MODERN SLAVERY

GreenSoft believes in full disclosure and presenting an accurate picture of our actions and progress on reducing the risk of modern slavery in our operations. Any instances of modern slavery or corrective actions that have had to be taken will be included in this annual Statement.

In 2019, no gaps in compliance with the MSA or FAR regulations, or with GreenSoft's internal Code of Conduct, were observed by or reported to GreenSoft; therefore, no corrective actions were taken.

All GreenSoft employees have previously been issued a copy of the Code of Conduct and Anti-Slavery and Human Trafficking Statement, and have signed an acknowledgement of receipt and understanding of the Code of Conduct. All new hires receive a copy of the Code of Conduct and this Statement at the start of their employment with GreenSoft.

## TRAINING ON MODERN SLAVERY AND TRAFFICKING

GreenSoft's Anti-Slavery and Human Trafficking training is designed to help employees across the organization understand the principles, objectives and implications of GreenSoft's Code of Conduct. Employees are encouraged to raise ethical questions or concerns, and are made aware of their rights and the company's zero tolerance policy on modern slavery and human trafficking.

To ensure that all employees are able to fully understand GreenSoft's policies on modern slavery and human trafficking, the GreenSoft Code of Conduct and Anti-Slavery Statement is available to employees in both English and Chinese.

## CONCLUSION – THE FUTURE AHEAD

This statement represents our commitment to ensure GreenSoft has the appropriate risk assessment and due diligence process to eradicate any and all instances and risk of modern slavery and human trafficking from all GreenSoft business units and operations.

GreenSoft's business model provides us with a low-risk of modern slavery and human trafficking as a result of having no traditional supply chain. Still, GreenSoft is committed to protecting human rights and performing continuous evaluation and improvement on the risks and exposures of modern slavery and human trafficking.

Signed,

**Larry Yen**  
President, GreenSoft Technology, Inc.  
May 2020