

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the actions of InfoTrack Limited ('InfoTrack') in addressing modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2024.

Our Commitment

InfoTrack acknowledges that modern slavery remains a prevalent issue in the global community. Modern slavery is a criminal offence under the Modern Slavery Act 2015 and is an explicit violation of fundamental human rights. It can manifest in various forms including slavery, servitude, forced and compulsory labour and human trafficking. These practices exploit individuals for personal or commercial gains. InfoTrack has a zero-tolerance approach to any form of modern slavery.

InfoTrack recognises that in recent years the risks of modern slavery to many businesses on a global scale has increased and in turn, places unprecedented pressures on supply chains and increases the vulnerability of workers.

As a company, we are committed to continually improving to be the best, while upholding the highest ethical standards of conduct within our business activities. Integrity is at the core of all our business relationships and we are dedicated to preventing acts of modern slavery and human trafficking from taking place within our supply chain. We actively implement and enforce effective systems and controls to ensure that modern slavery has no place within the InfoTrack culture.

This statement sets out InfoTrack's approach to preventing and addressing modern slavery and human trafficking risks in our organisation and supply chain.

Our Organisation

InfoTrack's ultimate parent company, based in Australia, is ATI Global Limited ('**ATIG**'). InfoTrack is a leading legal technology innovator and has been the pioneer of e-conveyancing for over 9 years within the United Kingdom. We have over 300 employees across the UK, with offices located in London, Woking and Leeds. We currently deliver our end-to-end conveyancing solution to over 2,200 clients in the legal and conveyancing industries. Our business operation comprises of development, information security and IT infrastructure, finance, sales, marketing, HR, legal and customer support.

Our Supply Chain

InfoTrack's products and services are produced using data directly sourced from trusted third-party data providers such as: (a) UK Government agencies (including local authorities, drainage and water providers); (b) other professional search providers; and (c) His Majesty's Land Registry ('**HMLR**'). InfoTrack collates all this data and integrates it digitally and we provide reports and services to our clients via the InfoTrack platform. Outside of our products and services, we work with local suppliers for the provision of office supplies, IT infrastructure and

support services. We utilise the services of site maintenance contractors, cleaning contractors and recruitment agencies. This supports our day-to-day operations.

InfoTrack does not operate within an industry that is subject to a high risk of modern slavery. InfoTrack understands that the risks relating to suppliers will vary based on their geographic location and the type of service being provided. While the majority of our direct suppliers are located in the UK, for any third-party services outside of the UK, we ensure that appropriate modern slavery provisions are included and agreed to in all relevant supplier contracts. Where any third-party data provider is required to publish their own modern slavery statement in accordance with the Modern Slavery Act 2015, InfoTrack monitors and reviews the content of the statements published to ensure that the supplier's vision aligns with that of InfoTrack.

All suppliers that InfoTrack currently work with or seek to engage in new business relations with, are assessed regularly based on merit, quality of goods and services and commitment to ethical work practices.

As a market leader, InfoTrack endeavours to build long standing and progressive relationships with any suppliers we work with and considers the absence of modern slavery as a vital component of maintaining prosperous business relationships.

Management of Modern slavery risks

To combat forms of modern slavery we have implemented policies relevant to this area, including our Modern Slavery, Anti-bribery and Corruption and Whistle-blowing policies. These policies have been developed by key stakeholders in the business, approved by our board and published on our company HR platform.

In particular, our Whistle-blower Policy has been designed to support a culture of corporate compliance and ethical behaviour by:

- encouraging employees to raise any concerns and report instances of reportable conduct where there are reasonable grounds to support such action, without fear of intimidation, disadvantage or reprisal;
- providing mechanisms for the reporting and investigation of reported matters; and
- outlining the measures in place to protect a whistle-blower.

Our internal policies are reviewed and updated from time to time in accordance with evolving industry practices and in response to changes in legislation.

At our three UK offices, InfoTrack ensures that senior managers are based at each location to ensure that the appropriate escalation points are in place.

Our Modern Slavery Statement 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 present anywhere in our business or supply chains. This is complemented by our internal Modern Slavery Policy. This policy outlines how

reasonable suspicions should be handled internally as well as InfoTrack's vetting procedure for hiring new staff and supplier onboarding

Modern slavery risks within our operations

InfoTrack acknowledges that modern slavery can be present in all industries, however, we consider the risk of modern slavery occurrences within our internal operations to be inherently low due to the office and technology-based nature of our work. InfoTrack does not recruit seasonal or undocumented migrant workers. InfoTrack has not identified any instances or risks of modern slavery within our internal operations requiring mitigation or remediation.

InfoTrack recognises that certain geographic locations and types of services have a higher inherent risk of modern slavery as a result of known labour rights issues and vulnerable populations in those areas.

Summary

InfoTrack's Modern Slavery Statement is made pursuant to Section 54(1) Modern Slavery Act 2015. It has been prepared with the input of our legal and executive teams and has been endorsed by the Board of Directors of InfoTrack. This statement shall be reviewed and updated annually.

Scott Bozinis

Director and CEO
InfoTrack Limited