

## **Anti-slavery and human trafficking statement**

### **1: Opening statement from senior management**

M3ter Holdings Limited and its subsidiaries (the **Group**) is 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 senior management of the Group is committed to ensuring there is no slavery or trafficking within its supply chain and any actions taken and/or to be taken to ensure this are as effective as possible.

### **2: Structure of the organisation**

M3ter provides a metering and pricing engine for SaaS companies in the software and technology sectors. In its pre-revenue phase, the Group has raised over £14 million by way of investment. To find out more about the nature of our business, please click [here](#).

In order to enable SaaS companies to intelligently deploy and manage their usage-based pricing, we work with a range of suppliers who provide cloud infrastructure, software-as-a-service or consulting services. These supplier services all contribute to the building, operating and maintenance of m3ter's product, our customer-facing services or our business operations.

### **3: Policies**

As part of our commitment to combating modern slavery, we have implemented an anti-slavery policy.

We also make sure our suppliers are aware of our policy and adhere to the same high standards.

These policies have been developed by the senior management of the Group and will be placed on M3ter's website and made available to our commercial partners and customers upon request.

### **4: Due diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- internal auditing of suppliers;
- checking that suppliers have anti-slavery and human trafficking policies and procedures in place;
- validating that by using these suppliers we continue to adhere to our anti-slavery and human trafficking policy;
- conducting identification and background checks on new suppliers, recruitment agencies, and new recruits; and
- ensuring adequate protection for whistleblowers including whistleblower and grievance policies and an internal tool that enables anonymous whistleblowing.

Our 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; and
- provide adequate protection for whistleblowers.

### **5: Risk 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 conducting frequent risk assessments and ensuring the due diligence procedures in place are closely followed.

We do not consider that we operate in high-risk sectors or locations.

Where we identify potential risk, we will investigate and mitigate such risk through activities such as due diligence, improved procurement practices or industry collaboration.

We validate that by using these suppliers we continue to adhere to our anti-slavery and 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 our policy, we will immediately seek to terminate our relationship with the relevant supplier.

## **6: Effectiveness and KPIs**

M3ter uses key performance indicators (KPIs) to measure how successful we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. These are as follows:

- Aiming to provide training to all staff about modern slavery and how to identify key indicators of modern slavery existing in supply chains and who to report this to;
- Annually conducting random audits of selected suppliers;
- Annual benchmarking of the Group's approach to managing the risk of modern slavery.

## **7: Training**

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking 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 our business and supply chains.

## **8: Further actions and sign-off**

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Introduction of general awareness training to all staff
- Introduction of Anti-Corruption & Bribery Policy

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year commencing 01 January 2022 and ending 31 December 2022.

This statement was approved by senior management of the Group on

Signature: 

Date: 11 July 2022

**Griff Parry, Director of M3ter**