

likewise.

UK and Australia Consolidated Modern Slavery Statement

Fiscal Year 2021



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Modern Slavery Statement of Disclosure

This consolidated Statement is made in accordance with the *United Kingdom's Modern Slavery Act 2015* and the *Australian Modern Slavery Act 2018 (Cth)*, and it covers Likewize Services UK Ltd (Company number 08401611), a UK limited company, and Likewize Australia Pty Ltd (Australian Business Number 58 111 399 752), an Australian proprietary limited company (jointly, "**Likewize**", "**the Company**", "**We**", or "**Our**"). It is the Company's second Modern Slavery Statement under the *Australian Modern Slavery Act 2018 (Cth)* and our seventh under the *United Kingdom's Modern Slavery Act 2015*. However, this is the first time Likewize has consolidated this Statement and done so under the brand Likewize. It covers the period 1 January 2021 to 31 December 2021.

There is zero tolerance for modern slavery in the operations and supply chains of any company within the Likewize Group. We are committed to conducting business ethically, sourcing responsibly and continuously improving our approach to identifying modern slavery risks in our supply chain and operations. At Likewize, we believe human rights are everyone's right.

During the fiscal year 2021, we did not identify any instances of modern slavery in our operations or supply chain. However, we periodically review and update our understanding of our highest risk areas for modern slavery exposure. During our review, we identified one area in our business where the potential for modern slavery risks is higher than in other areas. This risk area is our indirect workforce (see below for a more detailed discussion on our indirect workforce). To combat this risk, we will continue employee training and initiatives as well as implement any necessary policies and procedures that help prevent modern slavery from permeating our workforce and supply chain.

Our Business

Likewize is a global company headquartered in the United States. We offer comprehensive protection and solutions for mobile devices, whether lost, stolen, damaged, malfunctioning, in need of an upgrade, or the user has questions. The world's largest brands, telcos and banks trust Likewize to look after approximately a billion of their customers. We operate in over 30 countries, resolving 250 million problems yearly across insurance, warranty, repairs, trade-ins, recycling and premium tech support.

Organisational Structure

Likewize Services UK Ltd and Likewize Australia Pty Ltd are wholly-owned subsidiaries of Likewize Corp., a US-based private corporation. Likewize Corp. is a subsidiary of Brightstar Capital Partners, a private US-incorporated equity firm and the ultimate parent entity that exercises control over the Likewize Group companies.

UK Entities Covered by This Modern Slavery Statement

During the fiscal year 2021, Likewize Services UK Ltd primarily derived its revenue from the supply of mobile phone products and the provision of business process outsourcing services. Likewize Services UK Ltd employed approximately 370 staff across its operations in the UK and was administered from its head office in Crewe, UK.

For the fiscal year 2021, Likewize Services UK Ltd controlled a majority interest in the following two entities:

- Brightstar Device Support Services Limited (Company number 10352315)– a dormant private limited company; and
- Likewize Services UK Limited Magyarországi Fióktelepe (Registration number 01-17-000828) – a non-trading Hungarian Branch of Likewize Services UK Limited.

We reviewed the annual consolidated revenue of each of these entities to determine whether they would be considered a reporting entity for the purposes of the *UK Modern Slavery Act 2015*. Other than Likewize Services UK Ltd, none of these entities or other Likewize Group companies in the UK meet the reporting entity criteria under the *UK Modern Slavery Act 2015*.

Australian Entities Covered By This Modern Slavery Statement

During the fiscal year 2021, Likewize Australia Pty Ltd primarily derived its revenue from mobile device and accessory distribution, supply chain and logistics, retail, financial and device protection services. As of 31 December 2021, Likewize Australia Pty Ltd employed approximately 240 staff across its operations in Australia and was administered from its head office in Melbourne, Victoria.

For the fiscal year 2021, Likewize Australia Pty Ltd controlled a majority interest in the following two Australian entities and one foreign entity:

- Prepaid Partners Pty Ltd (Australian Company Number 125 920 032) – an Australian proprietary limited company which was in Members’ Voluntary Liquidation for the majority of 2021; however, it was deregistered on 13 November 2021;
- Likewize Services Pty Ltd (Australian Company Number 090 918 399) – an Australian proprietary limited company which is a general insurance broker that specialises in providing mobile phone insurance solutions to commercial and corporate businesses; and
- Likewize India Shared Services, LLP – a limited liability partnership incorporated under the laws of India, which provides shared services such as accounting services and IT support to all Likewize Group companies globally, including Australia.

We reviewed the annual consolidated revenue of each of these entities to determine whether they would be considered a reporting entity for the purposes of the Australian *Modern Slavery Act 2018* (Cth). Other than Likewize Australia Pty Ltd, none of these entities or other Likewize Group companies in Australia meet the reporting entity criteria under the Australian *Modern Slavery Act 2018* (Cth).

Our Ethics and Compliance Program

Likewize is committed to conducting its operations lawfully and ethically. Since each employee of the Company contributes to the overall reputation of the Company, it is critically important that each employee maintains a high standard of legal and ethical conduct. The Likewize Ethics and Compliance Program is designed to ensure these goals are met by providing the necessary framework and resources.

Policies, Procedures and Initiatives

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 any part of our business. We continuously review and update all our policies.

The Ethics and Compliance Program includes our Code of Conduct & Ethics (the “**Code**”), which reinforces Likewize’s commitment to a safe working environment, encourages and requires ethical behaviour, maintains our high standards for integrity and honesty and demonstrates our firm commitment to ethical and lawful conduct. In this regard, Likewize has developed and implemented a combination of procedures and policies to ensure compliance with national and international laws, regulations and ethical standards. Likewize’s “Say Something” initiative encourages employees to report violations or suspected violations of the Code. We are committed to giving employees the power to raise any concerns without fear of retaliation and offer multiple outlets in which they, or third parties, can voice their concerns, including the confidential third-party helpline and website.

The Code applies to everyone working in the Likewize community, including our board of directors, management, suppliers and vendors, and is distributed to all employees globally. The Code describes the responsibility of all stakeholders of Likewize. It recognises that personal conduct, directly and indirectly, reflects upon the Company's reputation and successful business operation. Likewize's Values, contained in our Code, serve as a framework for our actions, culture and daily decision-making.

Our suppliers are subject to our supplier onboarding process. This includes our Principles of Vendor Conduct which reinforces our commitment to eradicating modern slavery from our supply chain. During the fiscal year 2021, we revamped our Principles of Vendor Conduct to clarify our expectations regarding labour standards, modern slavery and workers' rights.

Generally, suppliers to Likewize are subject to terms and conditions that govern supply terms, including compliance with all applicable laws. Our suppliers may also be required to demonstrate conformance and assurance that, where appropriate, they have flowed down our requirements to their suppliers.

Likewize performs due diligence assessments of potential suppliers as part of our supplier onboarding process to ensure they will comply with applicable laws. These assessments aim to obtain pertinent information about a supplier's profile to evaluate financial, operational, reputational and legal risks.

"Restricted Party Screening" is a compliance control that the Company uses to prevent it from transacting business with prohibited/restricted companies, entities or individuals. This control requires the Company to pre-screen its business partners against numerous "Restricted Parties List" to comply with governmental sanctions or other requirements prohibiting transactions with certain parties.

Likewize provides its employees, suppliers and the public with an independent and confidential Ethics Helpline (<https://www.likewize.ethicspoint.com>) that they can use to report any legal or ethical concerns or suspected wrongdoings, 24 hours a day, seven days a week, in six languages.

Ethics and compliance initiatives are provided under the guidance and support of Likewize's Ethics and Compliance Office. Other initiatives include resources for employees such as policies, training courses and tools that ensure business is fair, honest and transparent at all levels of our corporation. In the fiscal year 2021, we also launched training for all employees that covered what modern slavery is, red flags and whom to contact if they have questions or suspect where slavery may be occurring. Employees who fail to complete or adhere to ethics and compliance initiatives without a valid reason may face disciplinary actions.

Modern Slavery Risks

We periodically review and update our understanding of our highest risk areas for modern slavery exposure. During our review, we identified one area in our business where the potential for modern slavery risks is higher than in other areas. This area of risk is our indirect workforce. To combat this risk, Likewize will continue implementing and enforcing policies, procedures and initiatives that prevent modern slavery from permeating our workforce and supply chain.

The following are details of the potential modern slavery risks present in our workforce and supply chain:

1. Workforce

- We believe our risk of exposure to modern slavery in our *direct workforce* is low. This is due to our employees being primarily based in the UK and Australia, screened pre-employment, educated and/or skilled and operating in a work environment where established training courses, policies and procedures are in place and enforced. Nevertheless, we will continue to strive to remain attentive to any signs of modern slavery within our direct workforce.
- We have assessed that our risk of exposure to modern slavery increases when workers are not directly engaged by Likewize (i.e., our *indirect workforce*). This is due to the limited visibility into our partner's operations and hiring practices.
- However, to combat potential modern slavery risks associated with an indirect workforce, Likewize requires its partners to adhere to the minimum employment age limits, wage minimums, working hours and benefits defined by applicable laws and regulations and provide their modern slavery statement, where applicable.
- Furthermore, the indirect workforce most relevant to Likewize's operations (e.g., cleaning, staffing agency and transport/freight) has been working with us for some time, and we intend to continue to work with them over the long term. We know them, and they know we are committed to conducting business with integrity and adherence to all applicable laws and regulations.

2. Supply Chain

We have analysed modern slavery risks in our supply chain, primarily made up of suppliers of finished products, indirect services and distributors.

Likewize Services UK Ltd

- According to the most recent Global Slavery Index, the countries/regions we source most of our products have been identified as having a relatively low risk of modern slavery. So, for example, most of our suppliers are UK-based entities that we deal with directly and intercompany transfers from the EU and US.

Likewize Australia Pty Ltd

- According to the most recent Global Slavery Index, the countries we import most of our products from and the types of products we import have been identified as high risk of modern slavery. However, as Likewize Australia Pty Ltd does not manufacture its own products, we source more than 90% of our direct supply of products from large global Original Equipment Manufacturers ("**OEMs**") who supply us with finished products. These OEMs are required to publish statements describing the steps they have taken regarding complying with modern slavery laws. Where available, we have reviewed those statements and will continue to do so periodically.
- The remainder of our direct supply comes from low-risk countries. So for example, many of our suppliers have Australian-based entities that we deal with directly.

We generally consider our suppliers of indirect services (e.g., consulting, advisory, marketing, insurance and IT licensing and support) and our distributors at low risk of exposure to modern slavery. This is due to their workforce being primarily based in the UK or Australia and either educated and/or skilled.

Likewise assesses the effectiveness of these actions by regularly participating in audits of our internal controls, procedures and initiatives. We may also exercise our rights to audit our suppliers to demonstrate their compliance with applicable laws.

Consultation with owned and controlled entities

Likewise consulted with its owned and controlled entities, reviewed the annual consolidated revenue of these entities and determined they would not be considered a reporting entity for the purposes of the UK *Modern Slavery Act 2015* or the Australian *Modern Slavery Act 2018* (Cth). Nevertheless, officeholders of these entities have been advised of the respective Act and provided with information regarding the requirement to identify, manage and mitigate the risk of modern slavery in their operations and supply chain.

Conclusion

This Statement will be reviewed and published annually. It is made pursuant to section 54(1) of the UK *Modern Slavery Act 2015* and section 13(1) of the Australian *Modern Slavery Act 2018* (Cth) where relevant. It constitutes the Company's Modern Slavery Statement for the year ending 31 December 2021 and actions that we have taken as of the submission date of this Statement in connection with our effort to improve our ability to assess and address modern slavery risks. The board of Likewise Services UK Ltd and Likewise Australia Pty Ltd have approved this Statement.

You may obtain a copy of this Statement on Likewise's website at www.likewise.com.



Gerry O'Keeffe
Director, Likewise Services UK Ltd
July 2022



Andrew Hage
Director, Likewise Australia Pty Ltd
July 2022