Introduction from the Board

This statement sets out Thunderhead’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains. Thunderhead recognises that it has a responsibility under the Modern Slavery Act 2015 towards ensuring that our supply chains and our corporate activities are free from slavery and human trafficking and fully supports the government’s objectives to eradicate modern slavery and human trafficking.

Organisation’s structure

We are a pioneering software company and a recognised global technology leader in customer engagement and journey orchestration. Our ONE Platform empowers identity recognition, real-time interaction management, omnichannel customer journey orchestration and ultimately, delivers customer engagement. The Group has employees worldwide and operates in countries around the world including the United Kingdom, the United States of America, France, Spain, Italy, the Netherlands, Australia and South America.

Our supply chains

Our suppliers primarily include:

- Data centres that host our platform;
- Other SaaS (software as service) providers;
- Professional service companies such as lawyers and accountants; and
- Suppliers who enable us to operate our facilities such as reception and security.

As a SaaS company, we have assessed that the risk of slavery and human trafficking taking place in our own business or in our supply chain is relatively low. We operate in a technology environment with primarily professional, motivated, skilled and educated employees where the type of exploitation associated with modern slavery is unlikely to thrive. However, we remain vigilant.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Code of Conduct & Ethics 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.

Due diligence processes for slavery and human trafficking

We undertake due diligence when considering taking on new suppliers and have in place systems to:
• Identify and assess potential risk areas in our supply chains.
• Mitigate the risk of slavery and human trafficking occurring in our supply chains.
• Monitor potential risk areas in our supply chains.
• Protect whistle blowers.

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 Supplier Risk Management program. We have a dedicated compliance team, which consists of involvement from the following departments:
• Legal.
• Security and compliance.
• Human resources.

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 annual training to our staff.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:
• Ensuring we maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
• A review of supply chain policies, codes of conduct and our working practices to show commitment.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Thunderhead’s and its UK incorporated subsidiaries anti-slavery and human trafficking statement for the financial year ending 31 January 2021. The statement has been approved by the board who will review and update it on an annual basis.

James Bodha, COO

Thunderhead One Limited
August 2021