

Modern Slavery Act and Human Trafficking Statement

Turnford Systems Inc

4-March-2020

Introduction

This statement applies to **Turnford Systems Inc.** incorporated in Ontario, Canada, together with its affiliates and subsidiaries **Turnford Solutions Inc** incorporated in Delaware, USA, and **Turnford Consulting Limited** incorporated in the U.K., trading as **Leasepath** (“Turnford”). It sets out Turnford’s actions to understand all potential modern slavery risks related to its business. It also puts in place steps aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Our Organisation

Turnford acknowledges internationally proclaimed human rights and is fully committed to combat slavery and human trafficking. We design, develop, market, and export proprietary software products to customers in the financial services industries worldwide. We also provide system integration, consulting, and IT products and services in exchange for fees from customers.

Business and Supply Chain

Turnford condemns all forms of human trafficking, slavery, servitude, forced or compulsory labour and any other trafficking-related activities. Turnford is committed to complying with applicable employment and labour laws and ensuring we do not transact with non-compliant businesses within our supply chain. Turnford’s employees are not considered to be vulnerable to slavery, forced labour or human trafficking, and Turnford commits to fair and safe working practices and complies with all relevant employment laws and regulations.

Policies & Effectiveness

As a software and services company, we do not have a manufacturing base or supply chain for tangible goods. Accordingly, we believe there is a very low likelihood of slavery and/or human trafficking in our supply chain. However, we are committed to promoting and protecting human rights wherever we do business. We expect our suppliers and other business partners to be committed to ethical behavior, to comply with all applicable laws and regulations, and to take action to promote the eradication of human trafficking and slavery. We will continue to work with our suppliers and refine our own requirements and processes to reinforce our commitment to human rights and a culture of ethical behavior, integrity and respect.

Turnford’s policies are clearly defined and communicated to all employees and contractors. Turnford did not receive any reports of instances of modern slavery or human trafficking in the financial year ending December 31st, 2019.

Due Diligence

Turnford has:

- Implemented a due diligence process when onboarding any new suppliers.
- Reviewed our network of suppliers to identify any which might represent a high risk.
- Communicated a process within Turnford to ensure all our employees are diligent when onboarding new suppliers.
- Developed an employee code of conduct to accompany our employee handbook to include a new anti-slavery and human trafficking policy.

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits should this be deemed prudent;
- creating an annual risk profile for each supplier.

Awareness-Raising Programme

Turnford will raise awareness of modern slavery issues by circulating information relating to modern slavery and human trafficking to staff in its team handbook.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Turnford Systems Inc. Board of Directors on March 4th, 2020.

Jeffrey M Bilbrey

CEO

Human Rights Policy

Turnford's Human Rights policy applies to every Turnford employee and is based on the following key principles:

- Conducting all our business lawfully in all the communities that we serve and in a manner that respects and promotes human rights and equality for all employees, agency staff and suppliers wherever they are based.
- A recognition and respect of the fundamental human right to allow employees/people to lead a dignified and independent life, free from abuse, violations and any form of discrimination.

- A recognition that peoples' human rights can be directly and indirectly affected by the company's operations, products and services, and to take steps to identify and reduce the company's negative impact on communities and environments wherever possible.
- A desire to act as a responsible organization in achieving a common set of standards applying to all peoples and all nations in the commitment to continual social and economic improvement.
- Oppose and prohibit the use of human trafficking, child labor, slavery and slave labor, and expect the same from all our business partners and suppliers. As a global business, we are committed to compliance with the International Bill of Human Rights and both applicable labor laws and specific human rights laws such as the U.K.'s Modern Slavery Act.
- A commitment to seek to only enter into contractual relations with third parties who demonstrate a desire to apply similar principles to the above through their own frameworks and initiatives.

Supply Chain

Turnford recognizes that the successful implementation of our Human Rights Policy is heavily influenced by the cooperation and support of our supply chains.

If suppliers or contractors act in a way that is inconsistent with our Human Rights Policy and/or are complicit in any human rights abuses, Turnford will seek to terminate their contracts and end all commercial relations with them.