Modern Slavery and Human Trafficking Transparency Statement

This Statement is presented by Vision Critical Communications Inc. and its subsidiaries, which includes our UK subsidiary, Vision Critical Research Solutions (UK) Limited (collectively referred to in this Statement as the "Vision Critical Group", "we", "us" or "our"). It is made in accordance with the Modern Slavery Act 2015 to describe the steps taken by Vision Critical Group and, in alignment with our "People Matter" corporate value, demonstrates our commitment to implementing and improving upon practices to combat modern slavery and human trafficking.

Our Business

The Vision Critical Group is a provider of a cloud-based, software platform that allows customer organisations to build engaged, secure communities of stakeholders for on-going, real-time feedback and insights. The core of our supply chain consists of third party technology suppliers that support our software platform. While these core suppliers are generally understood to be low risk for slavery or human trafficking practices, we recognize that certain sectors in our supply chain (such as office equipment suppliers and the food and beverage industry) may be at a higher risk. We are committed to monitoring our supply chain and will determine appropriate steps in the event that we determine there may be a higher risk of slavery or human trafficking.

Our Policies & Commitments

The Vision Critical Group is committed to implementing and improving upon practices to combat modern slavery and human trafficking in our supply chains and throughout our business. Our policies and commitments, along with the due diligence, training and reporting steps described in this Statement reflect our on-going commitment to act ethically and with integrity in our business relationships and to monitor our internal systems to prevent slavery and human trafficking in our business and supply chains.

Our People

The nature of our business recognizes the importance of human relationships, At Vision Critical Group, we put people at the heart of our business through our corporate value that people matter, and aligned with this, all members of the Vision Critical Group are required to conduct their activities in accordance with our Code of Business Conduct and Ethics. Our Code requires our members to act according to the highest standards of honesty and integrity as well as comply with all legal and regulatory requirements, which extend to the protection of human rights and the prohibition of forced labour and human trafficking.

Our Supply Chains & Due Diligence

The Vision Critical Group expects our suppliers to treat workers and employees with respect, fairness and in accordance with applicable laws.

To ensure alignment between our values and ethics and those of our suppliers, the Vision Critical Group plans to review source locations of our procurement partners and certain direct suppliers. As a first step, we have canvassed active suppliers located in the UK, to assess their published commitment(s) to the prevention of modern slavery and human trafficking.

Going forward, we plan to implement a program to include a contractual commitment to the prevention of slavery and human trafficking in renewals and new agreements with our procurement partners and direct suppliers. Further, we have updated our primary procurement on-boarding process to include reporting on prospective suppliers’ commitment to anti-slavery and human trafficking practices.

Training & Reporting

To ensure appropriate understanding of the risks of modern slavery and human trafficking in our supply chains and within our business, the Vision Critical Group is committed to educating our employees, officers and other individuals who work for us, about the Act and will be providing training to relevant employees (specifically those involved with the procurement of suppliers). Further, we are taking steps to reinforce with all of our personnel, the available channels for reporting any suspected violations or similar concerns.

Further Steps

The Vision Critical Group will continue to monitor our practices and supply chains to develop and strengthen our commitment to human rights matters including the elimination of slavery and human trafficking.

This Statement is made by Vision Critical Group for the financial year ending December 31, 2017 and will be reviewed and published on an annual basis.

Scott Miller
Director and Chief Executive Officer
Date: December 7, 2017