

## **Modern Slavery Statement**

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the policy that Newland Chase, a wholly-owned subsidiary of CIBT, Inc., has taken and continues to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Newland Chase has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our Business**

Newland Chase is a global immigration company providing specialist immigration services worldwide. Our corporate head office in London's Angel Court – our regional offices in Australia, Brazil, Canada, China, India, Mexico, the Netherlands, Singapore and the United States, – and our network of in-country partners are regulated by the standards of legal practice in their country of operation, with standards that typically uphold and dictate exemplary ethical behaviour and conduct concerning the rights of and thereby the protection of human beings in any area that may be considered as slavery.

### **Our Policies**

We enforce a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These policies include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility verifications to work in the country of hire.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, anonymously and without fear of reprisals.
3. Internal compliance training. We have a robust and mandatory compliance training package in place for all employees working on global immigration matters

### **Our Network Partners**

Newland Chase works with a network of global partners. We conduct due diligence on all prospective partners, including an online check to ensure that particular organisation has never been convicted of offenses relating to modern slavery. We also have a mandatory compliance training for partners that we require all team members working on Newland Chase matters to complete and acknowledge.

In addition to the above, as part of our contract with network partners, we require that they confirm to us that they commit to the following business practices:

1. They pay their employees at least the national minimum wage / national living wage in the country of operations

2. None of their employees are required to lodge “deposits” or identity papers with them and that they are free to leave their employment after reasonable notice
3. They commit to the abolishment of child labour and guarantee that nobody is employed under the minimum legal age for employment.
4. They observe the right to reasonable remuneration on the basis of a contract in line with the respective national labour market, stipulating at least the minimum wages guaranteed by law
5. They guarantee the observance of the respective national regulations on hours of work and on regular paid holiday
6. They protect the health and safety of employees by complying with the standard applicable in their country. This includes access to clean toilets, drinkable water and, if applicable, clean facilities for food storage.
7. They treat employees with respect and dignity.

Newland Chase reserves the right to check the observance of these principles in a suitable manner if there is a well-founded suspicion to do so and will terminate the contract at any time should any instances of modern slavery come to light.

#### Our Next Steps:

As part of our efforts to improve on the effectiveness of our systems, we will evaluate additional steps during the course of 2018, including exploring opportunities to expand our whistleblowing policy externally and tracking attendance on specific and mandatory training modules around forced labour and human trafficking for all Newland Chase employees.

#### Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

#### Approval for This Statement

This statement was approved by:

Name: Steven Diehl; Managing Partner



Date: February 8, 2018