

This policy (the “Policy”) has been published and is made on behalf of Crucial Data Solutions, Inc. (the “Company,” “we” or “our”).

As a global organization, the Company is committed to high standards of ethical conduct and compliance with applicable laws and, as such, has a zero-tolerance approach to modern slavery and human trafficking. We are further committed to implementing effective systems of controls to ensure modern slavery and human trafficking are not taking place within our own business or in any of our supply chains. It is our expectation that our suppliers and business partners also conduct themselves in this manner.

This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Business structure and description of supply chain

The company globally sells a leading data collection platform that enables organizations to collect data in a regulatory compliant manner. In the course of day to day operations we engage with other leading suppliers of varying sizes and sectors throughout the world. These suppliers play an integral piece in supporting our growth and sustainability.

Relevant policies

We are dedicated to ensuring that our supply chains do not rely on or benefit from slavery or human trafficking. To this end, we have formulated, and seek to enforce, a code of conduct for our vendors (the “Vendor Code of Conduct”). The Vendor Code of Conduct requires our suppliers to:

- comply with all applicable human rights laws prohibiting child, forced, indentured, or involuntary labor.
- not tolerate harassment by our suppliers in any form, including verbal, physical, or sexual harassment.
- to provide equal opportunities in employment, development, and advancement for all qualified persons.

By requiring our business partners adherence to the Vendor Code of Conduct, we seek to implement and maintain a robust framework of controls to prevent slavery and human trafficking in our supply chains.

Due diligence in the supply chain

The Company has overall responsibility for ensuring this Policy complies with its legal and ethical obligations. Management of the Company are given the necessary training in order to understand and comply with this Policy (as discussed further below).

The Company carries out risk assessments in relation to its suppliers and to monitors its suppliers' compliance with the Code of Conduct as well as any other applicable national regulations. Where the Company identifies potential risks, we seek to increase our internal and external diligence protocols to

ensure that all our suppliers are compliant with the Code of Conduct and all applicable national regulations.

Where we suspect that any of our suppliers are relying on or benefitting from modern slavery or human trafficking, we would terminate our relationship with that supplier and make any necessary reports to the relevant authorities.

To date, we have received no reports of any incidents relating to modern slavery or human trafficking in our supply chains.

Training, reporting, and communication of this Policy

Each of the Company's employees and directors are required to adhere to *the "Code of Business Conduct and Ethics"* (the "Code"). Pursuant to the Code, employees and directors have a duty to report any known or suspected violation of the Code, including violations of the laws, rules, regulations or policies that apply to the Company.

Employees are made aware of this through onboarding and through regular training.

Further to the Code, we also ensure that our key employees are aware of any potential risk of modern slavery or human trafficking in our supply chains.

Compliance with this Policy

All parties subject to this Policy are expected to adhere to the requirements set out herein.

We expect all such parties to assist in the prevention, detection and reporting of instances of modern slavery and/or human trafficking and should any party have knowledge or suspicion of instances of modern slavery and/or human trafficking relating to or connected to the Company, then they should inform us as soon as possible.

In the event of any breach of this Policy, we will carefully consider the circumstances. In relation to our employees, any breaches of this Policy will be addressed through our disciplinary process and could ultimately result in dismissal. In relation to any other individuals or organisations with whom we have a business relationship, we will engage with such individuals or organisations and consider the appropriate steps to take. Such steps could involve a review of the risk mitigation measures in place, a requirement for the individual/organisation to remedy any identified breach, ongoing monitoring obligations, and/or the potential termination of the business relationship where appropriate.

This Policy has been approved by the Board of Directors of the Company.