



Anti-Slavery and Human Trafficking Statement

Organization Structure

This statement is prepared on behalf of Navisite LLC.

Navisite LLC is a leading international provider of secure enterprise-class cloud management, managed application hosting and services. The company's mission is to provide a complete suite of outsourced application and infrastructure management services that lower cost and increase efficiency for mid-sized enterprises, government agencies, and business units of Global 2000 companies. The turnover of Navisite LLC for the financial year ending 31st December 2018 was greater than the minimum amount required to offer this statement and establish our Modern Slavery Policy.

Navisite LLC has several subsidiaries in the USA and a footprint in the United Kingdom through our ownership of Navisite Europe Limited ("Navisite" or "we" or "our"). Navisite has its offices at DST House, St Mark's Hill, Surbiton, Surrey, KT6 40D.

Introduction

Navisite is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK's Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we prohibit the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. We are proud of the steps we are taking to combat slavery and human trafficking and are committed to reviewing our approach on an ongoing basis to improve our practices and eliminate risks.

Supply Chains

Navisite's main supply chain supply providers include IT Hardware and Software vendors who provide goods and services for our Data Centers and offices. In addition to this we have various vendors who provide Office supplies including cleaning. We use the services of a select list of Recruitment organizations for resourcing purposes.

As part of our initiative to identify and mitigate risk we have carried out a review of our supply chain to identify and assess any potential risks for slavery and human trafficking. We have then taken the steps outlined below and as set out in our Modern Slavery Policy to mitigate the areas of risk identified.

Employees

We comply with, as a minimum, all employment law requirements in the United Kingdom and honor important rights such as national minimum wage and paid holiday requirements. We also ensure that all of our employees have the right to work in the UK.

Agency Workers and Subcontractors

We are committed to ensuring that any employment agencies which supply us with workers and any sub-contractors are advised of our Modern Slavery Policy and confirm that they will comply with its terms or show a similar commitment to eliminating slavery and human trafficking in their business and own supply chain.

We expect all employment agencies to comply with their own obligations under UK law in respect of their business, including all agency regulations and employment laws.

Suppliers

We are committed to ensuring that all suppliers are advised of our Modern Slavery Policy and confirm that they will comply with its terms or show a similar commitment to eliminating slavery and human trafficking in their business and own supply chain.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring as far as we are able that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery 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.

Our Whistleblowing Policy also ensures that any concerns that our employees, contractors or suppliers may have can be raised without fear of retribution or being subjected to a detriment as a result.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and our contractors comply with our values we shall moving forwards be asking our suppliers, whether identified as high or low risk, to confirm that they will comply with our Modern Slavery Policy on the renewal of existing contracts.

If they are unable to commit to complying with our own Modern Slavery Policy we will expect them to show and evidence a similar or greater commitment to eliminating the risk of modern slavery in their business and their own supply chain.

If a supplier fails to confirm that they will comply with our Modern Slavery Policy, is unable to demonstrate, to our satisfaction, a similar or greater commitment to eliminating modern slavery, and fails to resolve these matters within a reasonable timeframe., then we

shall consider whether it remains appropriate for our business relationship with that supplier to continue.

Training

Our employees have will receive training on the risks of modern slavery and human trafficking in our supply chains and our business. All existing employees have been provided with a copy of our Modern Slavery Policy and invited to raise any questions or concerns that they may have.

Our Modern Slavery Policy will shortly be incorporated into our Employee Handbook. All new employees will be advised of the importance of our policy as part of their induction.

Our Effectiveness in Combating Slavery and Human Trafficking

We are committed to ensuring that we have been effective in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. Key Performance Indicators will develop over time, but we are currently focused on ensuring that all our suppliers commit to comply with our policy or the standards that it requires.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Navisite group's slavery and human trafficking statement for the financial year ending 31st December 2018. This statement was approved by the board of Navisite LLC on October 29, 2019.

Signed (for and on behalf of the board of Navisite LLC):

A handwritten signature in black ink, appearing to read 'Mark Clayman', with a stylized flourish at the end.

Mark Clayman
CEO | Navisite
11/15/19