



## Slavery and Human Trafficking Statement

For the year ended December 31, 2024

### Our Commitment

Xplor Technologies, LLC and its affiliated group companies (collectively “Xplor” or “we”) have a zero-tolerance approach to all forms of slavery and human trafficking. At Xplor, we always want to do the right thing. We try to make sure that no-one working at Xplor, or in our supply chains, is being exploited; that these people are safe; and that we follow all relevant employment, health and safety, and human rights laws and standards wherever we do business.

### About Xplor

We are a leading global platform combining vertical-specific Software-as-a-Service (SaaS) solutions, embedded payments and tools to help businesses grow and succeed. Headquartered in Atlanta, Georgia, USA, as at December 31, 2024, we employed approximately 2,200 people in Europe, the United Kingdom, Asia-Pacific and North America.

Xplor provides enterprise-grade software solutions for businesses in fast-growing “everyday life” verticals: Education, Fitness & Wellbeing, Field Services (maintenance, HVAC, lawncare, pest control and cleaning) and Personal Services (laundry and drycleaning); and a global, cloud-based payment processing platform.

Our technology products and services are developed in-house or sourced from professional suppliers in Europe, the United Kingdom, Asia-Pacific and North America. Our highly skilled workforce is primarily permanent employees. As a result, we believe we face minimal risk of experiencing slavery and human trafficking issues in our supply chains.

Xplor is managed on a vertical-by-vertical basis. This means that Xplor’s management teams has visibility across Xplor’s individual vertical teams and products; and across all companies within our group. This slavery and human trafficking statement has been prepared in consultation with stakeholders that have management responsibility for all Xplor’s verticals and for all our group companies.

### Our Policies and Controls

We maintain a system of policies and controls designed to run our business properly and ensure that slavery and human trafficking has no place at Xplor or in our supply chains.

All Xplorers must adhere to our policies, which reflect the commitment of both our senior management team and our company to act ethically and transparently. Our whistleblowing policy is a key tool for encouraging Xplorers to report any unethical behavior or practices; and they are empowered to do so without fear of repercussion.

In keeping with Xplor’s evolution, our policies and controls continue to evolve. One of our current areas of focus is to further strengthen our supplier due diligence and risk management processes, which are discussed in the following paragraphs of this statement. We are guided by our ethical culture and determination to see human rights upheld.

### Supplier Due Diligence

Xplor’s opposition to slavery and human trafficking is absolute. We will not knowingly support or do business with any organization involved in either of these activities. Should any supplier fail to meet our standards, we will stop working with them as soon as it is reasonably practicable to do so.

We are reliant on our suppliers to bring Xplor’s products and services to market; and are not directly involved in those suppliers’ operations. However, we recognized during the period that there was room for further improvement in our understanding of how our suppliers themselves combat modern slavery and human trafficking. As such, we remained of the view that this is a key area of potential risk in respect of modern slavery and human trafficking; and it remained the principal area of focus for this reporting period.

We continue to strengthen our supplier assessment requirements; and we undertook further work during the statement period to refine our groupwide procurement processes. Our approach requires any new supplier relationship to be approved by our Procurement team before we start working with them; and we ensure the Procurement team is able to consult for further guidance as needed (including, in particular, if any concerns were to come to light). We continue to seek contractual commitments from prospective new suppliers that they will observe all laws and regulations in the jurisdictions in which they, and we, do business.

As our organization evolves we will regularly review our assessment processes; and improve these where necessary.

## **Risk Management**

During this statement period we have continued to improve our processes for finding and contracting with new suppliers. We have continued to involve Xplor's Procurement team and other relevant stakeholder teams at an early stage of engagement.

During this statement period we once again updated our group policies and processes. Prospective suppliers will be required to disclose any circumstances in which they, or their suppliers, have been investigated under any legislation relating to modern slavery or human trafficking and any circumstances in which concerns regarding modern slavery or human trafficking have been raised.

Our company-wide training program is established and includes regular training related to understanding slavery and human trafficking, for all Xplorers. We continue to review the controls we use; and we're committed to managing any slavery and human trafficking risks.

## **Our Effectiveness in Combating Slavery and Human Trafficking**

We consider the risk of slavery or human trafficking in our business and supply chain to be low; and we are determined to make sure these practices play no part in the products and services we offer. Nonetheless we recognize that effectively identifying and addressing risks of modern slavery and human trafficking will be an iterative and ongoing process; and that further work is required. We are working to develop a set of indicators to meaningfully track performance in this area.

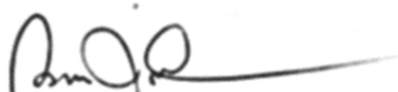
## **Training**

We have a robust and recurring training program for all Xplorers. This training includes specific topics to ensure that all Xplorers understand our expectation that they act legally and ethically when performing their duties. We remain of the view that specific slavery and human trafficking training is necessary to equip Xplorers to identify slavery and human trafficking risks. We therefore ensure that our program includes training on this subject; and that the relevant training materials are always available to Xplorers for their reference.

## **Conclusion**

This slavery and human trafficking statement applies to the entire Xplor group. This means it applies to AI Sky UK Holdco Limited, Harlands Services Limited, Debit Finance Collections plc and Fit Cloud Technology Ltd (including their respective non-UK subsidiaries, where relevant) for the purposes of the Modern Slavery Act 2015 in the United Kingdom. It also applies to AI Sky Aus Holdco Pty Ltd, Debitsuccess Pty Ltd, Links Modular Solutions Pty Ltd, Zenrol Pty Ltd, Paysmart Pty Ltd, QK Technologies Pty Ltd and MyXplor Pty Ltd for the purposes of the Modern Slavery Act 2018 (Cth) in Australia.

This statement was approved by the board of directors of Xplor on June 11, 2025, and will be reviewed annually.



Pamela Joseph  
CEO, Xplor Technologies