

## 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 is reviewing source locations of our procurement partners and certain direct suppliers. We have canvassed active suppliers located in the UK, to assess their published commitment(s) to the prevention of modern slavery and human trafficking. In addition, as part of our procurement on-boarding process, we ask new suppliers to outline and identify any procedures, relevant steps and anti-slavery policies they have place, which information is reviewed as part of our intake assessment.

Looking ahead, we plan to implement an automated program within our procurement intake process so new and renewing suppliers can confirm their commitment to ensuring no modern slavery or human trafficking in their supply chains. This program will help us to reach more of our suppliers as it relates to renewals and new agreements.

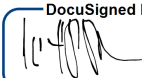
### Training & Reporting

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 has provided training to relevant employees (specifically those involved with the procurement of suppliers). We plan to extend similar training with all of our employees and are taking steps to review and reinforce 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, 2018 and will be reviewed and published on an annual basis.

DocuSigned by:  
  
02644DA138C246C...  
Scott Miller  
Director and Chief Executive Officer  
Date: December 7, 2018