



Modern Slavery Statement

Modern slavery is one of the most complex and important human rights challenges of our time.

According to the International Labour Organization (ILO), the term 'modern slavery' covers a set of legal concepts, including forced labour, debt bondage, and human trafficking. It's an umbrella term that refers to situations of exploitation where an individual can't refuse or leave because of threats, violence, coercion, deception, or abuse of power.

Slavery and human trafficking are abhorrent violations of human rights, and we're dedicated to ensuring that our business activities don't support such practices. We, Engineer.ai Corp and our subsidiaries (t/a Builder.ai), are committed to combating slavery and human trafficking in our business and supply chain.

It will take commitment, resources and innovative solutions from governments, international organisations, the private sector, and civil society to prevent modern slavery from impacting so many. At Builder.ai, we appreciate the unique responsibility of the private sector in these efforts and are committed to understanding and addressing any modern slavery risks that may arise in the course of our business.

Our company does not tolerate modern slavery, so we've put steps in place to ensure that there is no slavery or human trafficking in our own business and supply chains.

We're a global organisation that encompasses a number of different corporations across the United States, United Kingdom, India, Europe and the Middle East. This statement is made on behalf of all the entities within the Builder.ai Group, and complies with the requirements of the United Kingdom Modern Slavery Act, the Australia Modern Slavery Act, and the California Transparency in Supply Chains Act. This statement demonstrates our efforts to identify, prevent, and mitigate the risks of modern slavery and human trafficking within our sphere of influence.

Organisational structure

We develop multi-platform software and apps, as well as the provisioning cloud capacity and management services. Builder.ai uses proprietary artificial

intelligence technology to assist with automating the software development process, and leverages scale and technical expertise to offer cloud infrastructure development, hosting and management services to a global client base.

We aim to empower anyone and every business to build any website or app that they can imagine – in a simple, fast and cost effective way.

Our main operations are located here:

US - Engineer.ai Corp. is a Delaware registered company and is the ultimate parent of the Builder.ai Group. There is also an office in Salt Lake City, Utah.

UK - Engineer.ai Global Limited is registered in England and Wales and has an office in London. It's a subsidiary of Engineer.ai Corp.

India - Engineer.ai India Private Limited and Engineer.ai Cloud Services India Private Limited are registered in Delhi, India and have an office in Gurugram, Haryana. It's a subsidiary of Engineer.ai Corp.

Singapore - Engineer.ai (Builder.ai) Private Limited is registered, and has an office in Singapore. It's a subsidiary of Engineer.ai Corp.

We also have satellite offices in the United Arab Emirates and France, with individuals based in other countries, working remotely.

While we operate in a sophisticated services sector in a professional environment, that isn't deemed to be a higher risk industry for modern slavery practices, we continue to be mindful of the possible risks and implement appropriate measures to combat these. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Our commitments

1. Ethical business practices:

Uphold high standards of ethical business conduct and integrity in all our operations, emphasising respect for human rights, labour rights and dignity.

2. Legal compliance:

Comply with all applicable laws and regulations regarding modern slavery and human trafficking in the countries where we operate.

3. Risk assessment:

Conduct regular assessments to identify potential risks of modern slavery and human trafficking in our operations and supply chains. This

includes evaluating the countries, sectors and suppliers we engage with.

4. Supplier due diligence:

Expect our suppliers and business partners to adhere to the same principles and values we uphold. We conduct due diligence on suppliers to assess their compliance with anti-slavery and human trafficking laws and regulations.

5. Policies and procedures:

Implement robust policies and procedures to address modern slavery and human trafficking. These include our Supplier Code of Conduct and Responsible Sourcing Policy, which clearly communicate our expectations and requirements to suppliers.

6. Training and awareness:

Provide training and awareness programs to our employees and suppliers to promote understanding and vigilance against modern slavery and human trafficking risks. This includes specific training for employees involved in procurement, supply chain management and human resources.

7. Reporting and whistleblowing:

Maintain a confidential and accessible reporting mechanism for employees and external parties to report concerns related to modern slavery and human trafficking. We treat all reports seriously and take appropriate actions to address any allegations.

8. Continuous improvement:

Commit to continuously reviewing and improving our efforts to combat modern slavery and human trafficking. Collaborating with industry partners, non-governmental organisations and other stakeholders to share best practices and enhance our approach.

People

Our Head of the People Team is responsible for our anti-slavery initiatives:

- Policies: creating and reviewing policies relating to our workforce.
- Risk assessments: in respect of human rights.
- Due diligence: in relation to known or suspected instances of modern slavery and human trafficking.

As part of our recruitment process for employees and contractors, we carry out checks before anyone joins Builder.ai. Our People team looks for potential red-flags for modern slavery and follows up on any irregularities, which may

indicate that there's an issue. We perform identity checks, reference checks, right to work checks, criminal record checks, and where applicable, education and professional qualification checks for our staff.

Our People team works closely with our Legal team to ensure that our recruitment and screening practices are fit for purpose and that any instances of modern slavery are identified, reported and appropriate action taken.

We've also set up an 'Ethics Hotline' that employees can use to report any concerns they might have direct to the Legal team.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, we require all staff to read and acknowledge the Employee Handbook, which contains the policies set out in the section below.

We provide training for all new starters and annual refresher training to all employees on company processes, as well as to our managers on how to look after their teams effectively. All employees are required to undergo the training programme to understand modern slavery and the 2015 Act.

We communicate our commitment to addressing the issue of modern slavery in our business and supply chains to all suppliers, contractors, and business partners at the outset of our business relationship with them.

Policies

The following policies set down our approach to the identification of modern slavery risks and the steps taken to prevent slavery and human trafficking in our operations:

- *Ethics and Business Conduct Policy*
- *Partner Code of Conduct*
- *Acceptable Use Policy*
- *Anti-Corruption Policy*
- *Anti-Harassment Policy*
- *Anti-Bullying Policy*
- *Whistleblowing Policy*

Supply Chain Management

As a technology company, our most significant risks in relation to modern

slavery, relate to our supply chain. So we're focussed on working with long-term, strategic partners who demonstrate the same commitment to socially and environmentally sustainable procurement as us, to ensure modern slavery plays no part in their business.

We contract with a developer network to assist with certain aspects of software development, as well as engaging with professional and business support service providers. These networks are multi-jurisdictional and each developer goes through technical and suitability assessments before we contract with them.

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. The Company's due diligence and risk mitigation process includes:

- Seek to work with only the best and most reputable individuals and businesses in their industry or field
- Carry out background checks on new suppliers to establish their reputation and do our best to know who we're working with
- Build long-standing relationships with our most reputable suppliers and making clear our expectations of all new business partners
- Evaluate the modern slavery and human trafficking risks of each new supplier
- Contract our suppliers on standard terms that allow us to enforce uniform standards across the business
- Invoke sanctions and penalties against suppliers who fail to meet performance criteria or conduct standards, including the termination of the business relationship.

Compliance

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us, partnering with us, and servicing us. Builder's employees, partners and vendors are required to avoid any activity that might lead to, or suggest, a breach of this policy and our commitment.

If you believe or suspect that a conflict with this policy and commitment has occurred, or may occur in the future, please notify the Builder Legal Department at legal@builder.ai. We encourage openness and transparency and support anyone who raises genuine concerns in good faith under this policy and commitment (even if they turn out to be mistaken). Everyone is encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains as early as possible.

Further action

We remain resolute in our commitment to combating modern slavery and human trafficking. We'll continue to strengthen our practices, engage with stakeholders and drive positive change within our operations and supply chains. We acknowledge that eradicating modern slavery is a shared responsibility, and we actively seek collaboration and partnerships to contribute to this global effort.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated, as necessary.

Signed,

Joe Norena, COO
Engineer.ai Corp.
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