

## **U.K. Modern Slavery Transparency Statement**

For financial year ending December 2019

This statement is made on behalf of Ogury Ltd and its affiliates (collectively referred to as “Ogury”) pursuant to section 54(1) of the Modern Slavery Act 2015 (MSA). It sets out steps that have been taken by Ogury to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business as well as our supply chains.

### **Our organisation**

Ogury is a mobile data platform that provides a comprehensive view of mobile user behaviour globally, offering a deterministic picture of a consumer based on what they are interacting with on their mobile devices. Ogury empowers organizations with the most thorough and accurate knowledge of mobile users, their mobile journeys, and the mobile ecosystem. Integrated with thousands of apps, Ogury collects raw signals from mobile devices after user consent, at scale. Ogury’s state of the art machine learning engine interprets these signals and generates unique, high-quality mobile user and journey data. With access to over 400MM mobile user profiles in 120 countries, Ogury today has worked with more than 700 clients globally.

Founded in 2014, Ogury has its headquarters in London, United Kingdom and serves its customers through offices across the United States, Latin America, Europe, Australia and Singapore.

### **Our values and policies**

As part of our commitment to ethical business practices, we implemented internal measures to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Our values. We strive to maintain the highest standard of employee conduct. Ogury’s values of Integrity, Execution, Grit, Autonomous Thinking and Humility make clear to our employees the actions and behaviour we expect from them when representing our company.
2. Contract Approval Policy. Supplier agreements are reviewed by our legal teams and risks relating to modern slavery.
3. Recruitment policy. We operate a robust recruitment process that includes conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

### **Supply chain and risk assessment**

Ogury’s supply chains include suppliers of technology services, IT hardware and other office equipment, professional services from our lawyers, accountants and other advisers, office cleaning and other office facilities services and services relating to marketing events.

Having assessed the situation, we believe we generally deal in a low-risk industries. To date, we have not been made aware of or discovered any human trafficking or slavery activities within our Group and supply chain.

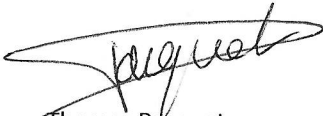
However, if we were to learn of any such activities, we would act immediately in accordance with our legal and moral obligations.

**Looking Ahead**

Following the review of our current policies, we will strive to maintain practices and policies already in place and also develop new initiatives to tackle any threats of slavery or human trafficking in our organisation and our supply chain. We understand that it must be a continuing effort requiring periodical review and reassessment in light of changing global circumstances.

*This Transparency Statement, pursuant to section 54 of the Modern Slavery Act 2015, has been approved by the board of Directors and will continue to be updated annually.*

On behalf of Ogury,

A handwritten signature in black ink, appearing to read 'pasquet', written over a horizontal line.

Thomas Pasquet

27<sup>th</sup> of February 2020