UK Modern Slavery Transparency Statement
For financial year ending December 2021

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, the Personified Advertising company, has created a breakthrough advertising engine that delivers comprehensive audience interest, brand performance, privacy protection and sustainability within one technology stack, built and optimized for mobile. Advertisers working with Ogury benefit from fully onscreen impactful ads, future-proof targeting and unwavering protection. Publishers enjoy the rewards of exclusive premium demand, incremental revenue and enhanced monetization with Ogury’s solutions.
Founded in 2014, Ogury is a global organization with 450+ people, including 100 engineers across 12 countries.

Our Values
We strive to maintain the highest standard of employee conduct. We employ people from all backgrounds who the share ambitions and values of our business.
Ogury’s values of Integrity, Execution, Grit and Creative Thinking make clear to our employees the actions and behaviour we expect from them when representing our company.

Our Processes and Policies
We are committed to respecting human rights and tackling modern slavery and human trafficking risks in both our supply chains and any part of our business.
As part of our commitment to ethical business practices, in the last reporting year we have implemented the following internal measures to ensure that we are conducting business in an ethical and transparent manner:

1. Global Code of Conduct. We encourage our employees to aspire to high ethical standards to ensure modern slavery is not taking place in our business or in our supply chains.
2. Contract Approval Policy. Our Legal & Risk department conducts thorough reviews of our suppliers to ensure that there are no risk relating to modern slavery.
3. Gifts and Hospitality Policy. Our employees are prohibited from offering or accepting any gifts or hospitality unless they serve a bona fide business purpose.
4. Anti-Bribery and Corruption Policy. We do not condone any form of corrupt or unethical behaviour in business dealings, including in relation to modern slavery and human trafficking.
5. Whistleblowing Policy. We encourage employees to raise any concern of wrongdoing, including concern related to modern slavery and human trafficking, without fear of reprisal or victimisation. Our whistleblowing policy provides employees with various means by which they can confidentially raise concern.
Recruitment
Ogury operates 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. We review our pay rates regularly to ensure minimum rates are above the statutory minimum and living wage requirements that are applicable in the countries we operate in.

Supply Chain and Risk Assessment
Ogury operates across Europe, the US and APAC and its 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.
Our supply chains are not ones that would normally be associated with slavery or forced labour and having assessed the situation, we believe that 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 Ogury and its 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 to 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 has been approved by the Board of Directors of Ogury and will continue to be updated annually.

On behalf of Ogury,

[Signature]

Thomas Pasquet
Chief Executive Officer