Statement on Modern Slavery

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “MSA”) and constitutes the slavery and human trafficking statement of BONDAP LTD.
This statement addresses the period from January 1, 2025, to December 31, 2025, in compliance with the requirements of the United Kingdom Modern Slavery Act, the Australia Modern Slavery Act, and the California Transparency in Supply Chains Act.
Metrics contained herein cover 2025 activities, unless otherwise indicated. This statement excludes any entity that elects to report independently. Accordingly, this is not a joint statement covering more than one reporting entity.
It is our first published statement. The company still do not meet the threshold for mandatory reporting but we decided to publish our statement because we are committed to improving our practices to combat slavery and human trafficking and are committed to ensuring that slavery and human trafficking are not taking place in our supply chains or in any parts of our business.
BONDAP’s registered office is located at 5 South Charlotte Street EH2 4AN. While it primarily operates in the UK, BONDAP also provides services to customers located interstate and overseas.

Our Business

BONDAP is a technology consulting company supplying turn-key computing solutions and developing their own web-based applications based upon the latest technology together with providing superior customer support and training to take a client’s company infrastructure into the future and beyond.

The company currently provides **SaaS** (software as a service) Business solutions (means fully hosted, maintained and supported) in different areas, such as (but not limited to):

- B-SAFE. Health and Safety case management system that allows to control and investigate incidents, make risk assessments and perform audits and inspections, provide wide capabilities of reporting and analysis.
- B-CRM. Customer relationships management system allowing for work with complaints and feedback, subject access requests and other information enquiries.
- Freibaum. Very easy to use construction business’ support system. This Web-based software application supports the entire building lifecycle from requesting, conception, to construction, to facility management. The suite will support the needs of small contractors by offering: online collaboration, digital takeoff, estimating, and project and property management capabilities, all presented in a format that's easy to understand and use.
- Hovix. The system (with consulting/setting service) provides the possibility of granting automated hosting services on consumer’s own servers. This system will be interesting for firms who are planning to organize their own hosting for commercial purposes (to sell hosting services) or for internal use (for example, for big holdings – to provide their branches to locate and manage their websites on the holding’s own hosting).

BONDAP also offers **ecommerce** solutions, Web **hosting**, Web **development**, remote help desk **support**, customer **training**, and systems support.

By utilizing stateoftheart equipment and providing the necessary technical expertise, BONDAP brings to the market a fresh perspective on Technology Consulting.

Bondap works on the international market. We have clients from the UK, Japan, Vietnam, Australia, Russia, Italy, Germany, Hong Kong, etc. We are a highly professional team and provide consulting and outsourcing for many IT-companies. We also provide services to universities, laboratories and other education and science-related organisations, governments, legislative bodies and councils.
With operations and supply chains spanning the globe, we are committed to improving the working conditions of people who are connected to our business and recognize the need to monitor for conditions that put workers at risk of modern slavery.

Our Organisation's Structure

BONDAP LTD is a micro company having less than 10 employees. It is a private limited company that is a part of the BONDAP consortium. The BONDAP consortium includes BONDAP LTD (Edinburg, UK) and BONDAP Sp. Z O.O. (Gdansk, Poland) and aims to serve customers around the world and enterprises of all sizes, including start-ups, government agencies, and academic institutions through our SaaS, that are comprehensive and broadly adopted platforms.

Our Supply Chains

Our direct supply chain consists of goods and services provided by suppliers, which support our provision of products and services, facilities, events and functions. Suppliers have been contracted in key areas including:
• software;
• IT consulting services;
• IT hardware, telcom/internet and cloud services;
• education services;
• information subscription services;
• research and consulting services;
• building management services;
• other professional services;
• catering;
• events;
• sponsorship and advertising;
• business and trading services;
• publishing; and
• investment and banking services.
Our main supply chains are:

- Information Technology equipment and services
- Business and Trading Services
- Professional services

Within these categories we believe the following types of goods and services contract are likely to carry the highest risks in relation to modern slavery and human trafficking:

- Construction and land development
- Cleaning
- Catering
- Promotional goods

- Temporary labour

While modern slavery can be found among any population, we recognize certain groups are particularly vulnerable, including:

• Domestic and foreign migrant workers
• Contract, agency, and temporary workers
• Vulnerable populations (e.g., refugees)
• Young or student workers

We do not known yet: names of Tier 2 suppliers, terms of employment of contractors (e.g. Selling Partners, Suppliers, goods and services providers), where recruitment agencies are used.

Our Policies On Slavery And Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This commitment is supported by existing policies as well as changes to our processes, with a view to taking appropriate steps to address, if required, and prevent modern slavery in connection with our own
operations, as well as the suppliers who work with us.

What we are doing now Implementing a robust risk management framework ('RMF'), which is the totality of systems, structures, policies and processes in place to identify, assess, mitigate and monitor internal and external sources of risk that could have a material impact on BONDAP's operations.

Responsibility for implementing the RMF and managing the BONDAP's risks resides with the CEO, members of the senior management group
and other identified "risk owners".

The Chief Risk Officer will prepare a quarterly report regarding the
management of material risks, having regard to a detailed Risk and Control Register that outlines key risks that fall within material risk categories, their consequences, risk indicators, mitigating controls and additional risk monitoring and management activities. Risk mitigation plans in respect of
modern slavery risks will form part of the BONDAP's RMF and it is currently intended that these plans and actions in relation to improving
our management of modern slavery risks will be periodically considered by the Board as part of its oversight of our risk management activities.

BONDAP also has policies in place which apply to the procurement of goods and services, as well as policies with respect to recruitment,
ethical standards and conduct of personnel which apply to our officers, employees or contractors, such as:

- Social Value
- Supply Chain Management
- Workforce Matters
- Diversity and Equality policy
- Complaints Policy and Procedure
- Work health and safety policy

We intend to leverage these policies and procedures to improve awareness, identification and reporting mechanisms to manage modern slavery risks. We will also work to develop a modern slavery policy during the next
reporting periods.
In addition, we recognise the opportunity to use our supplier negotiations as a channel to build awareness of modern slavery risks, as well as our expectations regarding how they are managed in our supply chain. These negotiations occur at the commencement of the contract and, to a lesser extent, on renewal.
The selection of suppliers by BONDAP is initially managed by the Board of directors on a case by case basis. We are planning to implement a modern slavery questionnaire for a formal response by suppliers or a review of the supplier's Modern Slavery statement (if available) in the next reporting period.
Bondap is not aware, and has not received any reports, of incidents of modern slavery in our operations or supply chain during the reporting period. In the event an incident is brought to BONDAP's attention, the management team would assess the nature and scale of the incident and engage with the appropriate parties to clarify and seek to remediate the issue.
We are also in the process of implementing a suitable contracts repository software solution. The repository will include functionality to identify risks types, including modern slavery. It will also identify BONDAP contract manager and what the responsibilities of the contract manager are in identifying, managing and mitigating risks.

Actions that we commit to taking by the completion of our next reporting period include:
• Begin implementation of the internal Roadmap for Modern Slavery Risk Management.
• Considering how current policies and processes could be strengthened to include modern slavery considerations.
• Conducting awareness training sessions on modern slavery for relevant personnel.
• Undertaking a supplier risk assessment for newly engaged direct suppliers of BONDAP. Due to limitations in existing supplier data, a
risk analysis in relation to existing suppliers will initially only cover a portion of the total number of direct suppliers.
• Implementation of RMS.
• Implementation of modern slavery questionnaire.
These actions will allow BONDAP to make continual progress in ensuring the effective management of modern slavery risks.

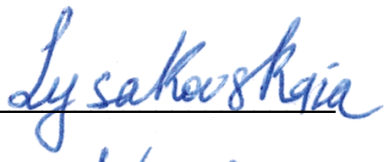
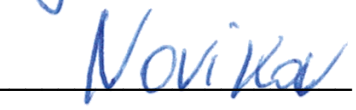
Evaluation Of The Effectiveness Of Our Actions

While BONDAP is in the early stages of developing its approach to managing this important issue within our own organisation and supply chain, we commenced our activities from a strong starting point and developed an internal Roadmap for Modern Slavery Risk
Management to guide our organisation through the set up and delivery of key actions and milestones to effectively address modern slavery risks. The
Roadmap is a working document that may change as our frameworks develop. The Roadmap sets out actions in relation to internal processes and controls, as well as a process of review, assessment and continual improvement.

Consultation With Our Internal Stakeholders

BONDAP's approach to managing modern slavery risks for this reporting period has been developed in consultation with key stakeholders across our organisation, to determine a broad-based set of actions to manage modern slavery risks. Internal stakeholders were consulted during the drafting of this statement and were given the opportunity to review and provide feedback at several stages of the process.

This statement was approved by the Board of Directors of BONDAP LTD on 2 January 2026.

Daria Lysakovskaia 

Pavel Novikov