
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 December 2021.

Neamapapa (the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

Neamapapa is the parent company of the Blue Crystal Consult group and has business operations in the United Kingdom as well as:

- globally

We operate in the e-Commerce sector. The nature of our supply chains is as follows:

We help our community of sellers turn their ideas into successful businesses. Our platform connects them with millions of buyers looking for an alternative - something special with a human touch, for those moments in life that deserve imagination.

For more information about the Company, please visit our website: www.neamapapa.com.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- **Recruitment and selection policy** - We investigate the backgrounds of those we seek to recruit and select.
- **Supplier code of conduct** - We trade fairly, ensuring that our supply chains do not exploit workers.
- **Whistleblowing policy** -
We encourage persons with information on exploitative practices by our suppliers and staff to inform us and ensure that we investigate fully, ensuring full anonymity.
- **Staff code of conduct** -
We ensure that staff are fully knowledgeable with our Code of Conduct especially the provisions relating to Modern Slavery and provide regular courses to sensitize them in this regard.
- **Procurement policy** - We ensure that everything we procure is free from any modern slavery practices.
- **Safeguarding policy** - We support organisations and institutions which safeguard against modern slavery practices.
- **Community sensitization campaigns** -
As part of our Corporate Social Responsibility we conduct sensitization campaigns when engage local communities.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.
- External supplier audits.

Our due diligence procedures aim to:



- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We consider that we operate in a high-risk environment because

The business operates in this risk level environment because the majority of our products are sourced from developing countries.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 6 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.
- We will carry out a regular audit of suppliers - 80 % of suppliers each year.

Training our staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

The statement was approved by the board of directors.

Georgina Amoh Bernard Amoh, Director
Neamapapa

2 March 2022

Date