

# Flowingly Compliance and Ethics Policy Document

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## Anti-Slavery and Human Trafficking Policy

Flowingly maintains a zero-tolerance approach to slavery and human trafficking within all parts of our business and supply chain. Our policies ensure that all employees are treated fairly, work with integrity, and receive appropriate pay.

-Our commitment extends to our relationships with customers, suppliers, contractors, and stakeholders, ensuring that modern slavery has no place in our operations.

-Policy Statement: Modern slavery is a violation of fundamental human rights. Flowingly is committed to ethical practices and implementing controls to prevent modern slavery within our business.

-Responsibility for the Policy: The Flowingly SLT team ensures this policy aligns with legal and ethical standards.

-Compliance: All employees are responsible for reporting concerns or breaches related to modern slavery. If unsure, consult with HR, direct-manager or a member of SLT.

-Communication and Awareness: Training on this policy is part of the employee induction process. We communicate our stance on modern slavery to all suppliers and partners.

-Breaches: Employees breaching this policy may face disciplinary action.

# Flowingly's Voluntary Modern Slavery Statement for 2024

This Modern Slavery Statement is voluntarily submitted in accordance with the [Australian Modern Slavery Act](#)

## Criteria One: Reporting Entities

Flowingly is a privately-owned company based in New Zealand, specializing in workflow automation software. Our company employs 30 staff members who work across various roles, including software development, customer success, and marketing.

As a SaaS provider, providing automated business workflows for clients. Based in New Zealand, our operations extend globally as we serve a diverse international customer base.

## Criteria Two: Structure, Operations, and Supply Chains

Flowingly's operations are focused entirely on delivering software solutions. As such, we do not have traditional supply chains associated with the production or sourcing of physical goods. Instead, our business relies on the use of digital tools, services, and professional partnerships to develop and maintain our software products. Our key service providers include those offering IT services, SaaS tools, and cloud-based platforms necessary to support our software operations.

## Criteria Three: Risks of Modern Slavery Practices

Flowingly operates in the digital technology and software industry, which generally presents a low inherent risk of modern slavery. Operations are primarily service-based and focused on delivering technological solutions, with limited reliance on physical goods production or supply chains traditionally associated with high-risk labor practices. The key areas identified as low risk include:

1. Software and technology industry: This sector is widely considered low risk for modern slavery practices due to the nature of the work, which is predominantly skilled labor in software development and management roles.
2. Supply chains: Flowingly's supply chains are primarily made up of professional service providers, SaaS tools, and other software resources. These areas are generally low risk for modern slavery practices.

## Criteria Four: Actions Taken to Assess and Address These Risks

To mitigate modern slavery risks, flowingly has implemented the following due diligence and risk management processes:

1. Partner and supplier vetting: We carefully select business partners and suppliers based on their ethical practices, ensuring they do not engage in practices linked to modern slavery.

2. Internal policies: We have implemented and maintain internal policies found such as:

- An anti-human trafficking and modern slavery policy, ensuring employees and partners understand our commitment to eliminating these practices.
- An anti-bribery and corruption policy, as part of our broader commitment to ethical operations.
- Adherence to all local and international labor laws and human rights frameworks.

3. Employee code of conduct: Our staff members are subject to a professional code of conduct that enforces fair pay, treatment, and working conditions. We promote diversity, safe working environments, and adherence to local and international regulations.

## **Criteria Five: How We Assess the Effectiveness of These Actions**

Flowingly evaluates the effectiveness of our efforts in several ways:

1. Internal Reporting Mechanisms: Employees are encouraged to report (anonymously, if preferred) any concerns regarding modern slavery, labor issues, or violations of our professional code of conduct. To date, no such reports have been received.

2. Monitoring and assessment: We continuously monitor and assess the risks of modern slavery across our operations and supply chains, maintaining a proactive stance to ensure compliance and ethical standards.

## **Criteria Six: Process of Consultation**

Consultation during the drafting of this statement involved internal discussions between key leadership within Flowingly. Ensuring that Flowingly's operational activities, supply chains, and partnerships are in compliance with the Australian Modern Slavery Act.

## **Further Steps**

In the next financial year, we will:

- Update personnel training in line with best practices;
- Ensure our operations and supply chains remain Modern Slavery-free;
- Continuously assess Modern Slavery risks.

Additionally, our Director of Operations Brooke Ahern has completed a course on Modern Slavery from the University of Technology Sydney and is actively working to further strengthen our policies, training, and awareness programs for staff as well as refer to resources in the [Anti-](#)

[Slavery Australia website.](#)

## **3. Anti-Bribery and Corruption Policy**

### **1. Purpose**

The purpose of this Policy is to outline the key principles and requirements that support Flowingly's culture of zero tolerance towards bribery, corruption, and facilitation payments. It applies across all areas and levels of our business and details the obligations of our people.

### **2. Who this Policy Applies To**

This Policy applies to all Staff and agents, or representatives of Flowingly.

### **3. Key Principles**

We recognize the negative impact bribery and corruption can have on communities. It undermines economic growth, accountability, democratic processes, and human freedoms, while distorting competition. Flowingly is committed to:

- Zero tolerance for bribery and corruption.
- Prohibiting any Flowingly Representative from offering, giving, receiving, or accepting bribes, kickbacks, or facilitation payments.
- Ensuring transparency in business activities, with sufficient documentation.
- Promoting a culture of compliance with our zero-tolerance policy.
- Conducting appropriate due diligence with those we do business with.

### **4. Zero Tolerance**

Bribery involves offering, promising, or giving something of value to improperly influence a person's actions or decisions to gain or retain business benefits. Bribery and corruption can take many forms, such as cash payments, facilitation payments, kickbacks, political or charitable contributions, gifts, travel, hospitality, rebates, or reimbursements.

Flowingly has zero tolerance for bribery and corruption. No Flowingly Representative shall:

- Offer, promise, or give, or
- Seek, accept, or request a financial or other advantage with the intention of securing an improper business benefit.

This applies to public officials, companies, and private individuals in any country.

### **5. Political and Charitable Donations**

Flowingly does not permit political donations to parties, candidates, or political causes. Charitable donations must not be made for commercial advantage. All charitable donations must be reported to the Finance team for annual reporting.

## **6. Gifts and Entertainment**

Gifts or entertainment offered to influence business decisions are strictly prohibited. If a gift or entertainment is provided as part of a tender process or has an obligation attached, it must not be accepted.

However, culturally appropriate gifts with no obligation, or business-related entertainment in line with normal commercial practices, may be accepted.

## **7. Compliance**

Any known or suspected violations of this policy should be reported to your manager or a member of SLT.