



NETFIELD MEDIA S.L.

# Anti-Slavery Statement

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Reviewed by: Head of Operations / CEO

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## CONTACT

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## **1. Preamble**

Netfield Media S. L. (referred to as ,us‘, ,we‘ or ,Netfield‘) sees itself responsible for upholding human rights. We do not in any circumstances tolerate slavery, human trafficking or any other inhumane treatment. This statement establishes:

- Our commitment to conducting business with integrity and standing against human trafficking, forced, debt-bonded, indentured, and slave labor.
- The actions we have taken to understand potential modern slavery risks related to our business and to ensure these events do not occur in any part of our business.

## **2. Definitions**

We consider that modern slavery encompasses:

- Human trafficking
- Forced work by mental or physical treatment
- Being owned or controlled by an employer by mental or physical abuse or the threat of abuse
- Being dehumanized, treated as a commodity, or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

## **3. Our Company and our Statement**

Any staff member, contractors, moderators or any other organization or individual related to us, is responsible to enforce this policy and stands for its ethical and legal obligations. This also includes zero tolerance for slavery, human trafficking and thus, these or similar procedures are identified and treated as abhorred practices, which are absolutely not tolerated in our operations, or any entity related to us.

#### 4. Actions and prevention methods

To prevent any fraudulent behavior we implemented a series of techniques and software to monitor and prosecute such actions.

This includes:

- Moderators who tracks online and real-time chats and video calls
- Software with keyword searches to monitor suspicious activities, videos, chats or any other content who was uploaded from content creators or amateurs
- Transaction monitoring to prevent payments regarding modern slavery practice
- Recurring employee trainings to identify and understand such actions

If a breach of this policy (regardless from the reason) is tracked, counter measures and awareness raisings are applied immediately. These measures includes the following:

- Account suspending and reporting
- Deleting of media relating to such an action
- Notification to authorities such as responsible staff members to review the report
- Cooperations with law enforcement authorities
- Disciplinary actions which may result in termination or dismissal of any contractual or other relationships



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