

Modern Slavery Act

Transparency Statement

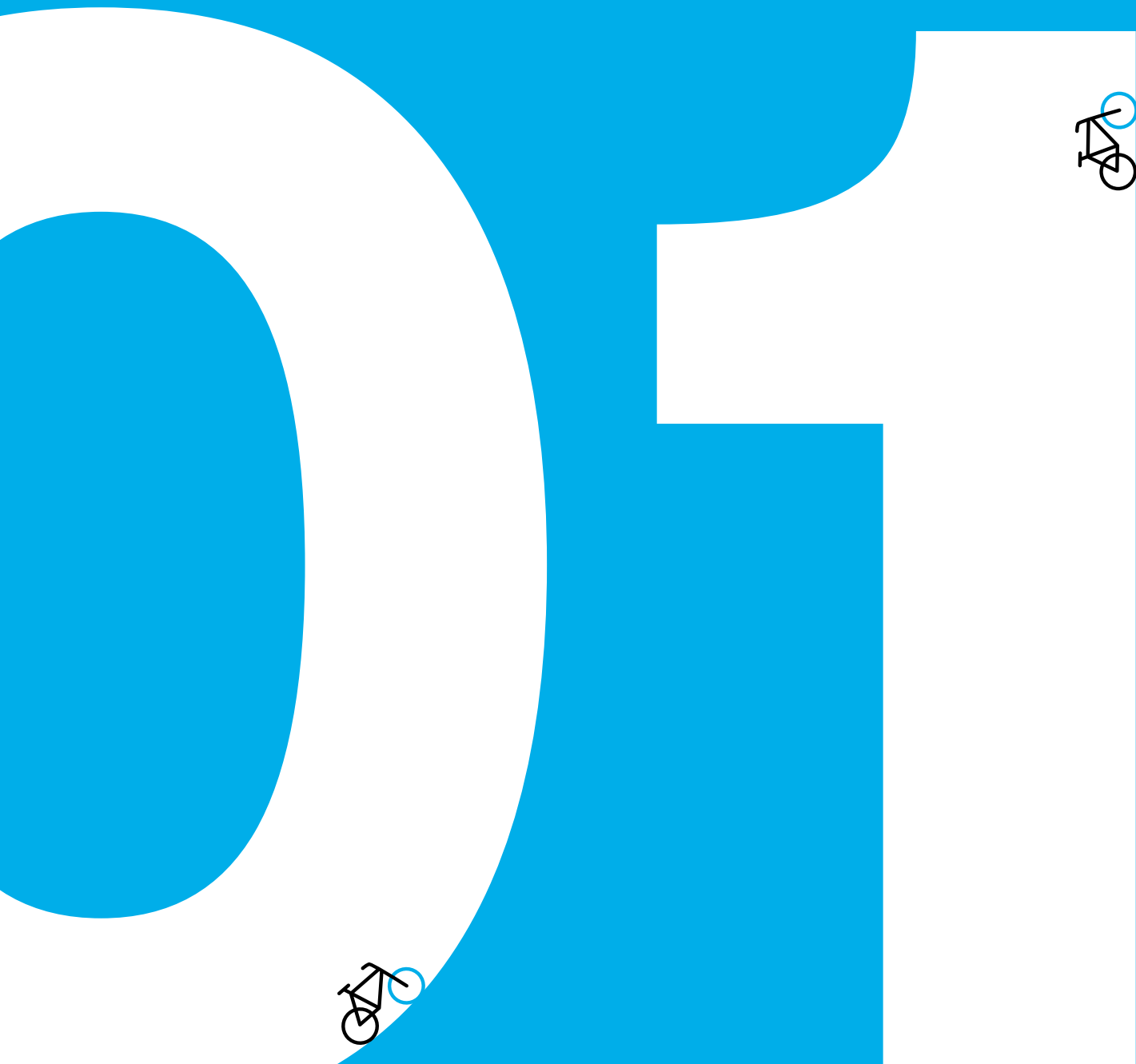
The bike membership.

Swapfiets

Table of contents

ABOUT US 01	3
INTRODUCTION 02	5
OUR INTERNAL WORKFORCE 03	7
OUR SUPPLY CHAIN AND POTENTIAL RISKS 04	9
OUR POLICIES 05	12
GOALS AND FUTURE ACTIONS 06	16

About us.



About us.

In 2014, three students from the Technical University of Delft started the world's first 'bicycle-as-a-service' company. The idea: Swapfiets members are granted their own always-working (e-)bike for a fixed monthly fee. If the bike has an unexpected issue, it will be repaired or replaced within 48 hours for free. We're not a student start-up anymore. Over the years, Swapfiets transformed from a start-up founded by students into one of the leading suppliers of micro-mobility in Europe.

As a member of the B Corp community, we believe that businesses should be a force for good. And as such, we have a purpose-driven mission: to lead the movement to more liveable cities.

We envision cities to be places where people and the planet can prosper. Biking makes for healthier and happier people, and our circular business model gets and keeps people on bikes towards more liveable cities.

To deliver our service, we need bikes, parts, and people to create them. Therefore, we acknowledge that our noble mission cannot be limited to improving the cities in which we operate. We cannot ignore the externalities. So, we must ensure that everyone working to make it happen, is safe and protected.



Introduction.

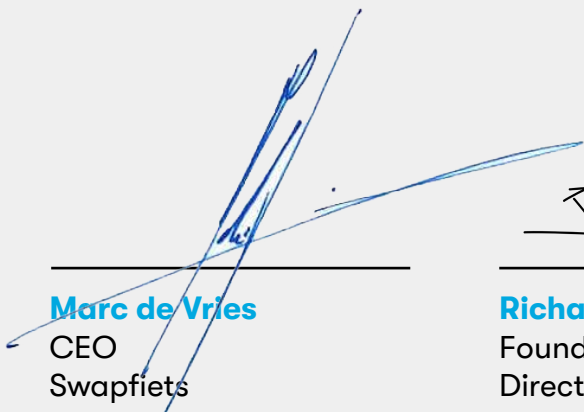


Introduction.


Swapfiets is committed to having a positive impact, including on the workers in our supply chain. We want to ensure that these workers are respected and provided with safe, non-exploitative working environments. We do not tolerate breaches; we are committed towards continuous improvement to protect human rights.

Modern slavery is a term used to encapsulate servitude, forced or compulsory labour and human trafficking. Unfortunately, the latest estimates by the International Labour Organization show that 50 million people are in modern slavery worldwide, and 28 million of these cases are related to forced labour. Therefore, with international supply chains, a risk of this heinous crime is present. This statement outlines the work that we have undertaken to prevent modern slavery and human trafficking across our value chain and to ensure that our business partners uphold our values concerning human rights. Moreover, we acknowledge that global supply chains require continuous efforts to mitigate the risk of modern slavery. Thus, we also outline our strategy going forwards.

This statement is pursuant to section 54(1) of the Modern Slavery Act 2015, concerning the financial year 1st January through 31st December 2022. This statement has been presented by Swapfiets UK Ltd. on behalf of the whole Swapfiets group. Swapfiets fully supports the Act, and we are committed to taking meaningful actions to safeguard against the risk of human rights violations in our value chain.



Marc de Vries
CEO
Swapfiets



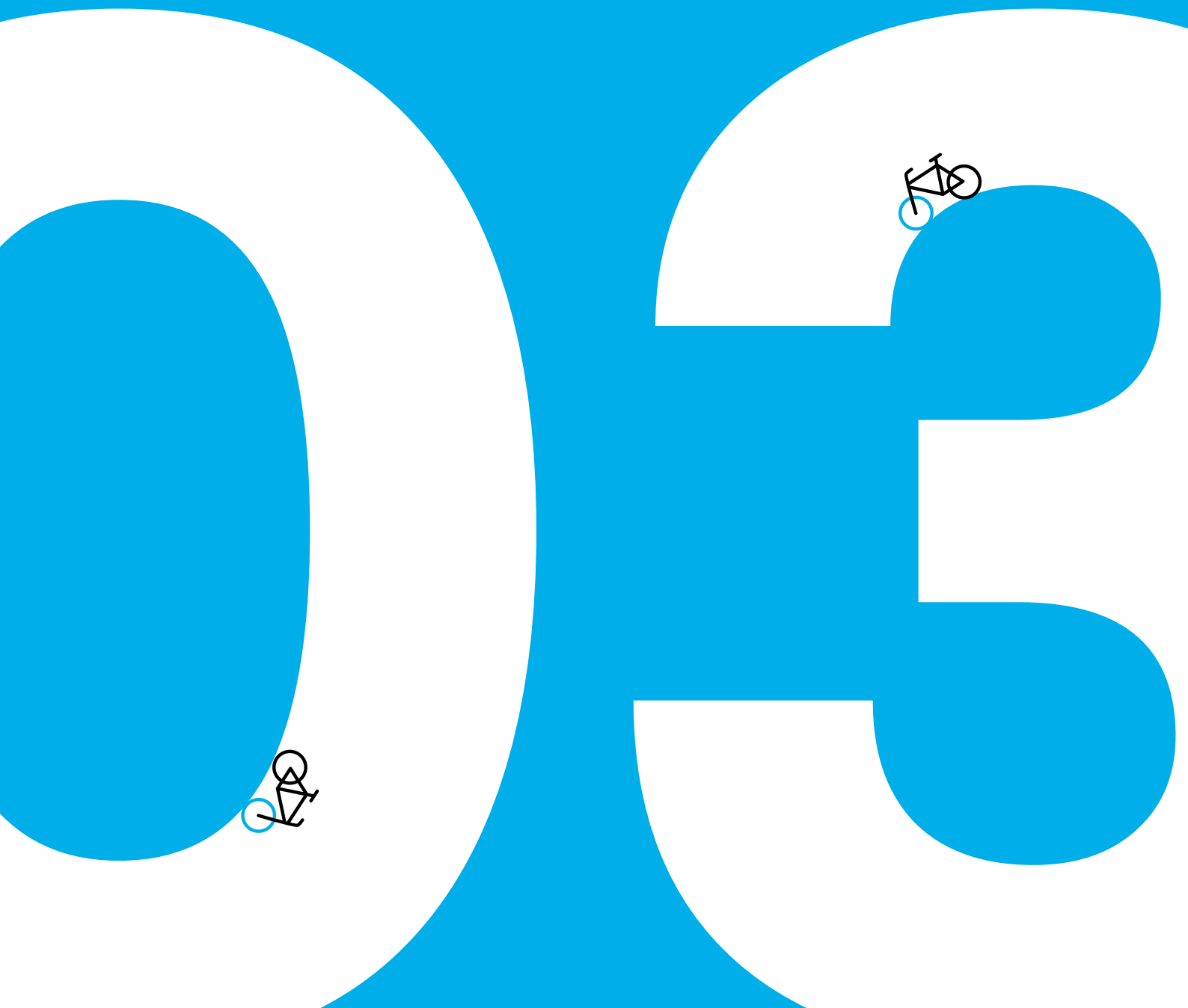
Richard Burger
Founder
Director of Sustainability
Swapfiets



Martijn Obers
Founder
Director of Products
Swapfiets



Our Internal Workforce.



Our Internal Workforce.

280 000 members

9 countries

60 cities

The Netherlands

Germany

France

UK

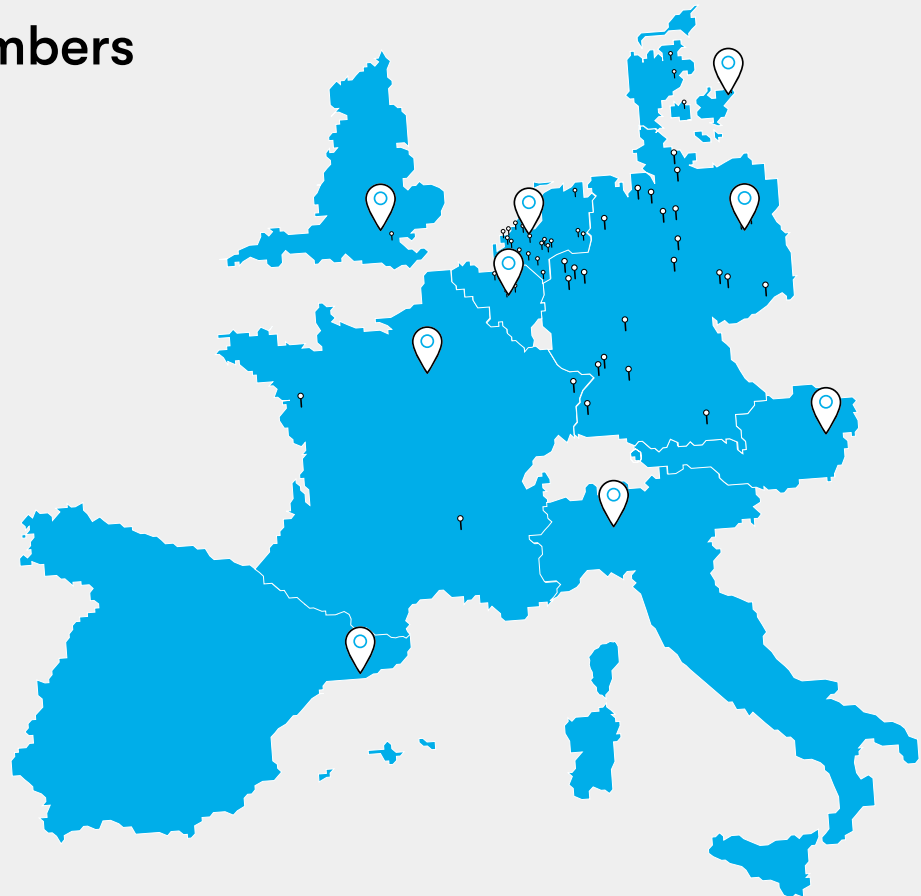
Belgium

Denmark

Spain

Austria

Italy



We now have more than 280.000 members across the Netherlands, Germany, Belgium, Denmark, Austria, Spain, Italy, the United Kingdom, and France. We have dedicated teams of employees who work across these countries. We have rigorous policies to ensure our direct workers have a safe, inclusive environment where they can learn and grow. These policies are outlined in a document, which is shared with employees along with their contracts. This document covers the following topics in detail: terms of employment, salary, holidays, pension, duty to report, confidential support advisor, time recording, illness and incapacity for work, interests, behaviour and privacy. Our internal teams work to ensure that the rights of our employees are respected and protected.

Our Supply Chain and Potential Risks.

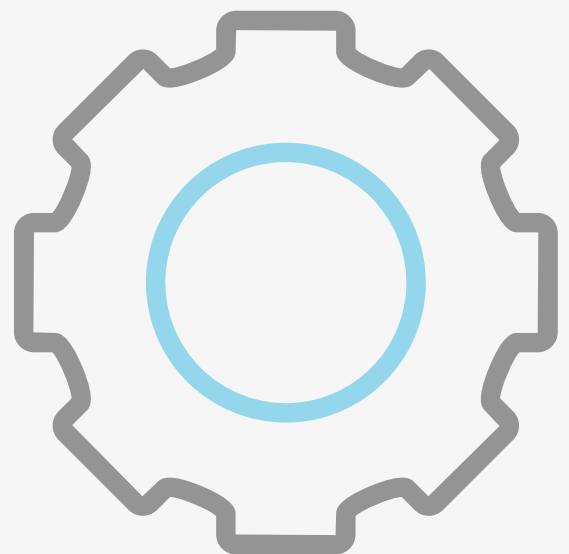


Our Supply Chain and Potential Risks

Before our bikes reach our members, our bikes must be designed and produced. Our dedicated product team works with circular design principles: to produce the best bike possible, then to get these products to our members. We then collaborate with trusted partners to make it happen, and get these bikes to our members. These partners make up our global supply chain. Our tier 1 suppliers fall into two categories. Firstly our partners who assemble our finished bikes, and secondly our partners that supply our spare parts. The most salient risks that are present in our supply chain, are dependent upon the country and sector.

Country Risks: Whilst the cities we are active in have high social standards, a number of the countries in our upstream supply chain that supply our spare parts are not under the same legislative protocols.

Sectoral Risks: The manufacture of electrical components, is reliant upon the mining processes for rare materials. Globally, many human rights violations have been associated with cobalt and lithium production. Therefore, this section is specifically susceptible to human rights risks, and extra caution must be taken.



Our Supply Chain and Potential Risks

The risks in our supply chain may include:

- 1 Child labour
- 2 Involuntary/forced labour
- 3 Health and Safety
- 4 Excessive working hours
- 5 Low pay and income inequality
- 6 Discrimination
- 7 Bullying and harassment
- 8 Inhumane treatment

Therefore based upon these risks, we exercise due diligence, through the policies detailed in the next section.

Our Policies.



Our Policies.

We have policies in place to mitigate these aforementioned risks, and prevent any incidents of human rights violations. Firstly our suppliers have to sign off our terms and conditions: these cover topics of child labour; discrimination; forced, hidden or dangerous work; sound and secure working and living conditions; and the right of freedom of association.

Moreover, we require all tier 1 suppliers to sign and adhere to our **Code of Conduct**. This policy ensures compliance with our standards on the topics of people, the planet and progress. The requirements under the people pillar are relevant to this human rights statement. A concise overview of these topics is as follows:

CHILD LABOUR

We expect our suppliers to comply with all applicable laws and regulations related to the minimum age for permission to work, per the applicable ILO Conventions and the Convention on the Rights of the Child.

INVOLUNTARY LABOUR

All forms of forced labour are not allowed. Our suppliers must ensure that all work is voluntary and employees are free to leave.

HEALTH AND SAFETY

We require our suppliers to adopt a proactive approach towards identifying, analysing and reducing hazards and risks associated with their business, services and products. They must ensure a safe and healthy workspace. In the case of accidents, we expect investigation and remediation efforts to be taken. It is prohibited to discipline employees for raising safety concerns. And accident insurance, adequate to local standards, must be in place for all employees.

WORKING HOURS

Working hours correspond at least to the respective national legal requirements or the minimum standards of the relevant economic sectors.

Our Policies.

WAGE AND BENEFITS

Compensation and benefits for a regular working week correspond at least to the local legally valid and guaranteed minimum. Where legal or collective bargaining agreements do not exist for defining a minimum wage, compensation and benefits are based on industry-specific collective agreements.

NO DISCRIMINATION

We require that employees are chosen, employed and supported based on their qualifications and capabilities. Any direct or indirect form of discrimination in providing employment opportunities, benefits or privileges in any form is prohibited.

NO BULLYING OR HARASSMENT

We do not permit bullying and harassment of any kind, including sexual harassment. We expect our suppliers to take appropriate and immediate action in response to complaints, knowledge or concrete suspicions of violations.

HUMANE TREATMENT

There is to be no harsh and inhumane treatment, including corporal punishment, mental or physical coercion or verbal abuse of employees. There is to be no threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to all employees.

DIVERSITY & INCLUSION

We require that our suppliers promote diversity and inclusion, in order for everyone to have equal access to opportunities: diversity is fully valued. Exclusionary behaviours will not be accepted. Everyone is equally treated with decency, dignity and respect.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We require that the employees have the right to associate freely and form and join workers' organisations of their own choice. They must have the right to seek representation and bargain collectively in line with all applicable laws and regulations and local usage. Employee representatives may not be discriminated against and may carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under applicable law and regulations, our business partners must facilitate - not hinder - the development of free association and bargaining.

Our Policies.

This code of conduct dictates that grievances should always be reported to the account manager in the event of violations, or threats thereof. In this context, the Code of Conduct calls attention to the principles of transparency, ownership and honesty, to provide an opportunity for remedial action collaboratively with our suppliers. By agreeing to this Code of Conduct, our suppliers are obliged to adhere to these standards and remedial efforts. But if we are not satisfied with the outcome, the termination of the business relationship, a claim for damages or any other legal measures can be enforced.

Legal Compliance

We expect our suppliers to ensure that they are compliant with all applicable laws. If these laws are stricter than those outlined in our policies, then the legislation with the highest protection is binding.

Further Due Diligence Processes

We are currently in the process of getting our suppliers onto a third-party platform, with the aim to track and collaborate with our suppliers. The rollout of this process is beginning in Q4 2022. The aim is to increase transparency, collaborate with our suppliers on improvements and mitigate the aforementioned risks. Once on the platform, our suppliers undertake a maturity assessment, covering company management, climate action, human rights and labour, and responsible sourcing. They are then scored on their performance in these categories.



Goals and Future Actions.



Goals and Future Actions.

As we have highlighted, this is a continuous process. Therefore the work does not stop here. Our immediate next step is to use the results of the maturity assessments to adjust our action plan.

Additionally, the risks outlined in this assessment are a preliminary step to understanding the salient issues in our supply chain. Thus, we will undertake further work to investigate this. Which will have a further focus on tier and supplier-specific risks and will be done jointly with our suppliers through our platform. Additionally, we aim to implement formal grievance mechanisms and set up supplier training. Finally, we will reevaluate and update our current policies based on their efficacy.



Swapfiets

www.swapfiets.com