

STATEMENT PURSUANT TO THE MODERN SLAVERY ACT 2015

Octo Telematics is a leading global provider of data analytics solutions for the auto insurance industry. We seek to transform the way auto insurance companies assess risk, deliver crash and claims services and manage their ongoing customer relationships by applying advanced analytics derived from behavioural, contextual and other driving telematics data. This data is analysed using our proprietary algorithms, allowing us to provide our insurance partners with actionable intelligence about their policyholders and enabling them to offer a range of differentiated, data-driven products and services.

Our solutions include user-based insurance and actuarial capabilities, crash reconstruction and claims management, and a number of value-added services, such as coordination of emergency response services. By using our solutions, auto insurance companies are able to employ more sophisticated risk assessment methodologies based on our data-driven and individualized risk analysis algorithms and offer additional value-added services to their policyholders.

Our ambition is to continue transforming the auto insurance and wider automotive and fleet industries. We will deliver on this ambition through our undisputed market leadership, unrivalled expertise and passion for data and analytics.

To achieve this, we must expect the highest standards of integrity and professional standards from our colleagues and our stakeholders. We try to act fairly, legally and with integrity in all our business dealings.

We believe in promoting human rights throughout the organization and adhere to all wage and labour laws in the jurisdictions where we operate. We condemn unlawful child or forced labour, including human trafficking and slavery, in any of our operations, and we do not knowingly conduct business with those who do.

Zero Tolerance

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Octo has a zero tolerance approach to any form of modern slavery. We believe in acting ethically and with integrity and transparency in all our business dealings, including those with other organizations. Octo has a dedicated compliance team, involving contributions from across the group's operational divisions including Audit, Finance, Legal, Human Resources, and Sales.

Suppliers

We work with our suppliers to build greater transparency within our supply chains. Octo commits to acting ethically and expects the same from those with whom it does business. As part of its contracting process, Octo requires its suppliers to commit to comply with all applicable laws and regulations, as well as Octo's policies.

Our Policies

Octo has a number of internal policies to ensure that it conducts business in an ethical and transparent manner. These include:

- **Code of Conduct.** This code explains the manner in which Octo behaves as an organisation and how it expects its employees and suppliers to act.

- **Conflict of Interest and Related Parties Policies.** These policies provide guidance for employees to exercise their judgement to ensure that personal interests do not conflict with the best interests of the company
- **Whistleblowing Policy.** Octo has an independently operated and run whistleblowing hotline so that all employees and business partners know that they can raise concerns about how colleagues are being treated, or practices within its business, without fear of reprisals.
- **Procurement Policy.** Among the procurement objectives upon which Octo chooses its suppliers are legality, accountability, and auditability. By using a wide range of best practices, tools and policies, we ensure that our supply chain meets our procurement needs and objectives.

Due Diligence and Further Steps

Octo has conducted an initial risk assessment of its worldwide supply chain and determined that most of our non-device suppliers are in locations which are considered to present a low risk of engaging in forced labour. These supplies are predominantly provided by professional services firms, employing highly educated and skilled staff.

Although our device suppliers are in countries with a higher risk of slavery, forced labour or trafficking, our technology consists primarily of capital intensive goods where both the constituent parts and their assembly into our devices requires the use of precision engineered robots. Human intervention in the assembly process is performed by technically skilled and trained individuals. These assembly processes are required to comply with numerous ISO and manufacturing standards, which are periodically independently examined and certified.

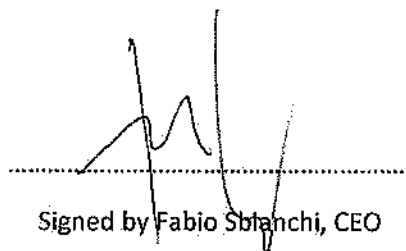
In both device and non-device areas, the nature of the services provided and the production processes mean that the risk of there being slavery, forced labour or trafficking is low.

Nevertheless, we periodically conduct our own internal audits of our major suppliers for a variety of reasons, among which we assess the likelihood of forced or child labour being used in our products. We have carried out audits of some of our suppliers, including those in locations with a higher risk of slavery, forced labour and human trafficking, and have found no evidence of such practices.

APPROVED

This statement has been approved by the Board of Directors of Octo Telematics Ltd and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes their slavery and human trafficking statements for the financial year ending 31 December 2017.

Octo Telematics Ltd



Signed by Fabio Bianchi, CEO

for and on behalf of the Board of Directors