

Docupace Modern Slavery Act Transparency Statement for the Financial Year Ending December 31, 2022

The U.K. Modern Slavery Act of 2015 and the Modern Slavery Act 2018 (Cth) of Australia requires certain companies to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their business and supply chains. The disclosures are intended to provide consumers with the ability to make better, more informed choices about the products and services they buy and the companies they support.

Summary

Docupace Technologies is committed to acting with integrity in all of our business relationships and maintaining and improving our systems and processes to avoid complicity in human rights violations related to our business operations, products, and supply chain. As a global corporate citizen, Docupace recognizes its responsibility to give back to and generate a lasting, positive impact on the communities in which we operate.

Our Structure

Docupace Technologies LLC is a Delaware Limited Liability Corporation, which is headquartered in Culver City, California. We have a European subsidiary, Docupace Europe SIA based in Latvia, and a Canadian-registered company, Docupace International Ltd, in Toronto, Ontario, Canada. While most of our business is conducted in the United States, we are also focused on growing internationally.

Our Business

Docupace is a solutions provider focused on digitizing and automating operations in the financial advice and investment industry. Financial services firms use the Docupace Platform (a cloud-based, integrated software suite) to reduce back-office expenses, improve efficiency, strengthen recruiting, and enhance the experience of advisors and investors. With headquarters in Los Angeles, Docupace is proud to serve some of the largest independent broker-dealers and registered investment advisers (RIAs) in the financial services industry. The company won the [2021 Gold Globe® Award](#) for "Hot Technology of the Year" and was named to [2021 Inc. 5000 list](#) of the nation's fastest-growing private companies. For more information, please visit www.docupace.com.

Our Supply Chain

Our leadership team is charged with the responsibility for making decisions on which vendors we select. Many of our contractors, partners, resellers, vendors, and other suppliers are based in the United States, and most of our procurement including our data center are from U.S.-based contractors, vendors, and other suppliers. Given the nature of our business, which involves providing cloud-based software-as-a-service to our customers, who are wealth managers, broker-dealers, investment advisors, governmental entities, and other organizations, our supply chain mostly consists of the hiring of independent consultants and other service providers and the procurement of other software-related goods and

services. We expect, and to the fullest extent possible when we enter into negotiated agreements we require, that our contractors, partners, resellers, vendors, and other suppliers comply with all applicable laws, which may include the Modern Slavery Act, depending on the nature of a particular transaction. Due to the nature of our enterprise software business, we consider ourselves to be low-risk with respect to slavery and human trafficking issues in our supply chain. We source goods and services from reputable third parties, and the nature of the goods and services we procure typically do not involve the types of labor at risk for slavery and human trafficking. We will not support a supply chain where we are aware of, or have reasonable ground to believe, that slavery and human trafficking are taking place.

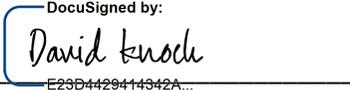
Code of Conduct

Docupaces' Code of Conduct sets out certain standards of conduct which to aid our officers, employees, and contractors in making proper ethical and legal decisions when conducting business for you and performing their day-to-day duties in compliance with our values and policies. All of our employees complete training when they join us and at least annually thereafter to ensure that they remain aware of and agree to comply with our Code of Conduct, our other applicable policies and procedures, and applicable law. Through our policies we communicate our values and expectations, setting a high bar for ourselves and our partners and making clear that we do not tolerate modern slavery. We are committed to consistently evolving and improving our approach. We regularly review our policies to identify areas for updates and improvement. We conduct in-depth benchmarking against international standards and evolving industry norms at least every three years in line with industry best practices.

Docupace Whistleblower Policy, which is contained in our employee handbook, includes procedures pursuant to which anyone at Docupace who have concerns about modern slavery and human trafficking in, or relating to, Docupace should report such concerns. A whistleblower as defined by this policy is an employee of Docupace who reports an activity that the employee considers to be illegal or dishonest business activity. The aim of this procedure is to ensure that anyone at Docupace is confident they can raise their reasonably held concerns without fear of reprisal or detrimental treatment because they have reported their concerns. This reporting procedure assists Docupace in monitoring and reviewing the risk areas identified and ensures that the company continues to develop appropriate risk management systems to counter any form of slavery, servitude, forced or compulsory labor or human trafficking in the supply chain.

Management Approval

This statement was approved by Docupace Technologies LLC on January 5, 2023, which will review and update it annually.

Signed by: 
David Knoch, CEO
1/5/2023

Date: _____