



Human Rights Due Diligence: Policy to Practice in Combating Forced Labor

February 7th, 2025

EXIGER





Exiger: Policy to Practice in Combating Forced Labor

- 01 **Exiger Overview**
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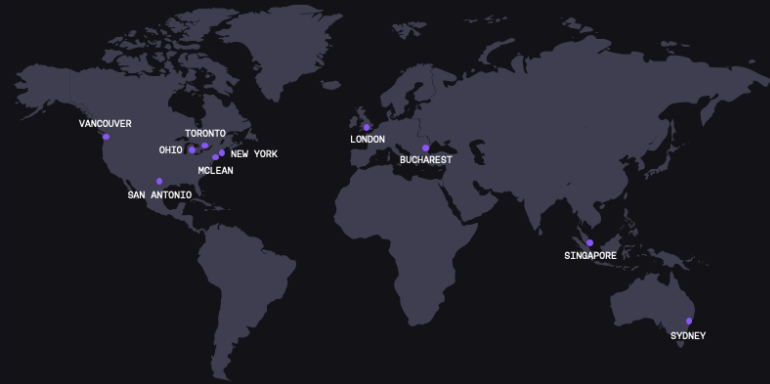
Exiger Overview



Exiger Overview

Exiger combines Global Capabilities and Scale...

Exiger supports both **virtual** and **on-site** delivery around the world



10

global delivery locations, supports clients in each time zone around the globe

Continuously expanding capabilities:

+30% annual revenue invested into R&D annually

5 acquisitions in 3 years to expand solution scope

800+ employees, 100+ data scientists, and a team of specialists including:

- ✓ FBI Agents
- ✓ DOD Executives
- ✓ Intel Analysts
- ✓ Compliance Technology Leaders
- ✓ General Counsels
- ✓ Chief Compliance
- Officers
- ✓ Investigative Researchers

\$1.8B

From Carlyle, Insight Partners to fuel continued growth and expansion

... with Local Expertise to Deliver Large Complex Programs

35+

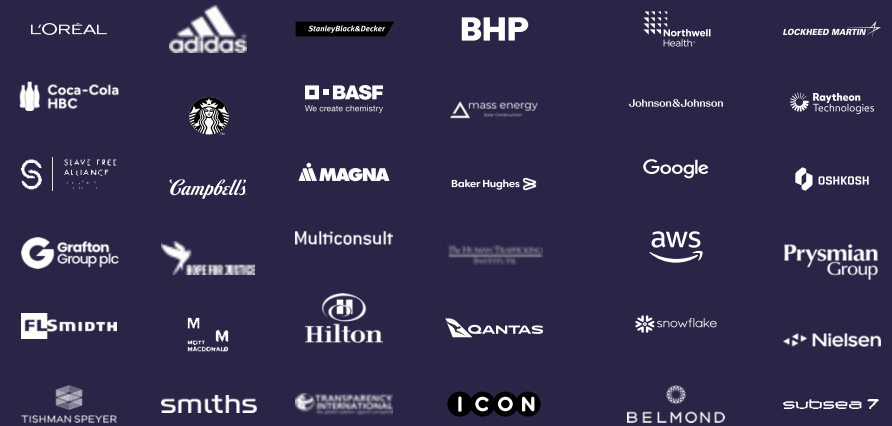
Languages spoken by employees, including English, Portuguese, Japanese and French

96

Languages supported by our technology to identify and manage risk & compliance globally at scale

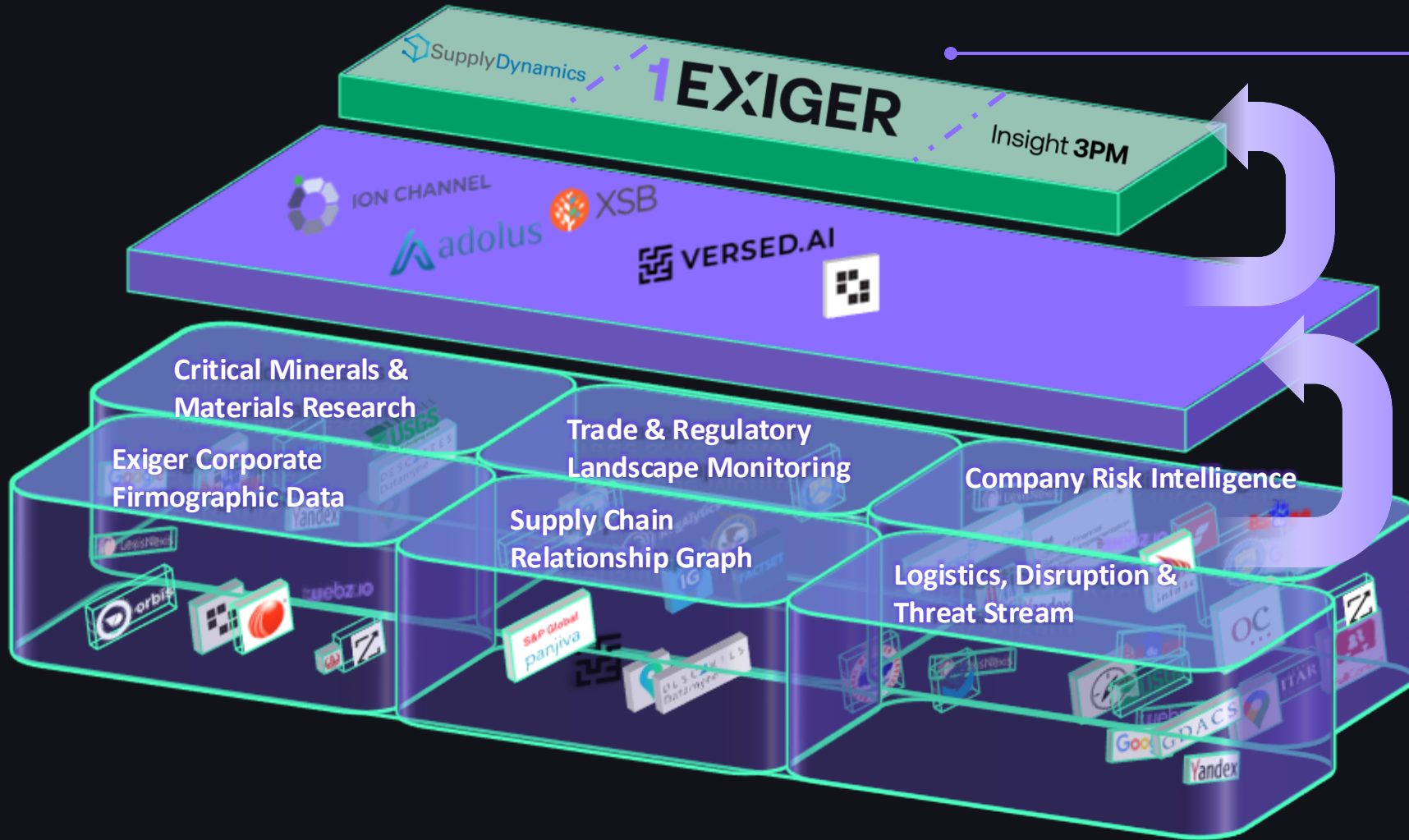
Exiger has successfully delivered to over **500 customers** globally, including **150 of the Fortune 500** and **60 government agencies**

Representative clients include:





Exiger's Proprietary Technology Ecosystem



User Experience

Intuitive user and supplier tools, generative & RAG AI interfaces and continuous active monitoring removes confusion and increases the actionability of risk event

AI Driven Mapping

Cutting-edge mapping solutions create a simplified and accurate link between suppliers, facilities, products, parts and locations

Data Layer

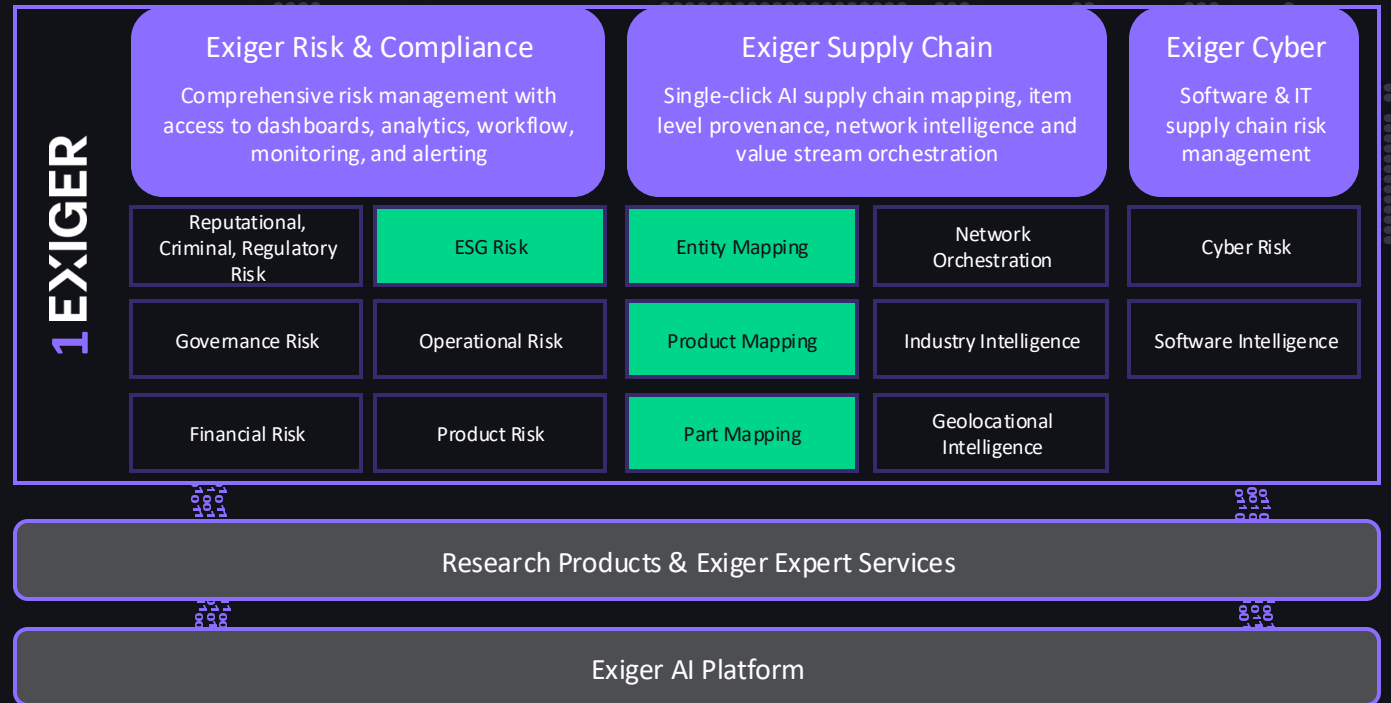
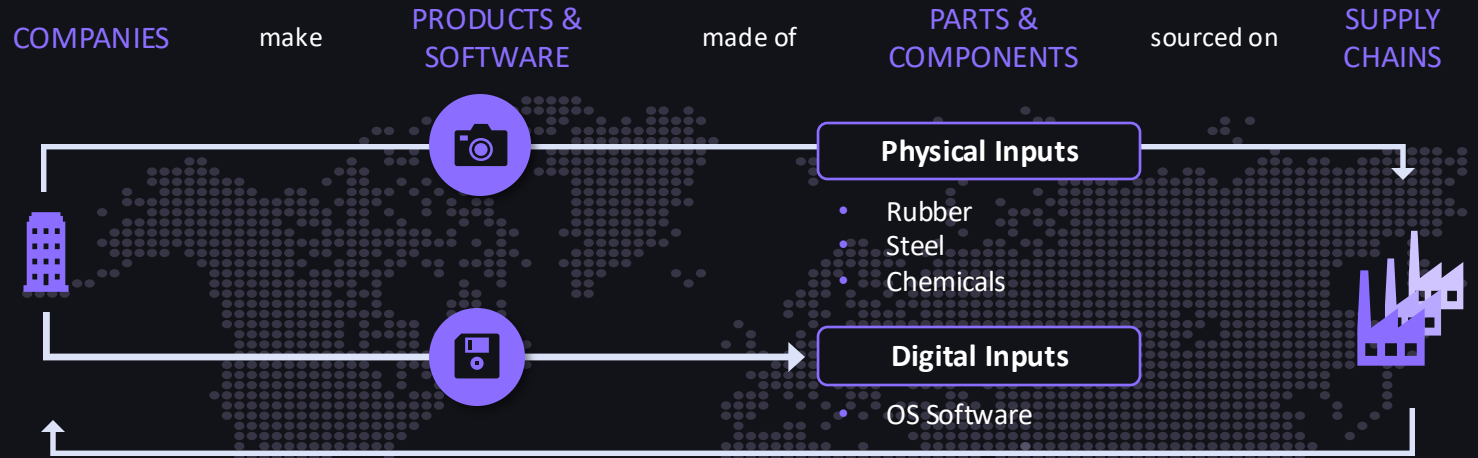
Exiger provides a comprehensive data infrastructure comprised of best of breed data providers and proprietary supply chain intelligence included in our license.



EXIGER is the Solution for Comprehensive Supply Chain Risk Management

1Exiger is a comprehensive, AI powered technology platform provides supply chain mapping, risk and compliance management at scale

Exiger’s technology is complemented by an expert services team to perform enhanced due diligence, boots on the ground support, hands on program operation, and directly supports reporting requirements



NGO WORK OVERVIEW:

“

EXIGER IS COMBATING FORCED LABOR AND MODERN SLAVERY WITH ADVANCED MACHINE LEARNING TECHNOLOGY THAT CREATES SUPPLY CHAIN VISIBILITY THAT WAS NEVER BEFORE POSSIBLE

”

Tim Nelson

CEO / Hope for Justice



SLAVE-FREE ALLIANCE

Working Towards a Slave-free Supply Chain

The HUMAN TRAFFICKING INSTITUTE



HOPE FOR JUSTICE



TRANSPARENCY INTERNATIONAL

the global coalition against corruption



GLOBAL EMANCIPATION NETWORK



“SUPPLIERS ARE ANNUALLY ASSESSED FOR COMPLIANCE WITH THE STANDARDS OF COCA-COLA HBC ARMENIA. ... THE INITIAL SCREENING AGAINST SOCIAL CRITERIA IS CONDUCTED THROUGH THE COMMON PLATFORM EXIGER.”



“HILTON CONDUCTS HUMAN RIGHTS DUE DILIGENCE [UTILIZING THE EXIGER PLATFORM] ACROSS OUR GLOBAL OPERATIONS AND IN OUR SUPPLY CHAINS TO IDENTIFY, ADDRESS AND MITIGATE ADVERSE HUMAN RIGHTS IMPACTS”



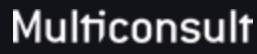
“UNDER TISHMAN SPEYER'S STANDARD UK OPERATING PROCUREMENT PROCESSES ALL NEW CONSTRUCTION AND PROPERTY SUPPLIERS ARE REQUIRED TO UNDERGO PRE-SCREENING AND PRIOR APPROVAL VIA THE EXIGER PLATFORM”



“EXIGER SUPPLY CHAIN MANAGEMENT SYSTEM ENABLES US TO INTERROGATE AND VERIFY THAT WE HOLD UP-TO-DATE AND ACCURATE INFORMATION ABOUT OUR SUPPLIERS AND THAT THEY COMPLY WITH THE REQUIREMENTS IN OUR POLICIES ON MSA ... BY THE END OF 2018, WE HAD RUN REPORTS ON APPROXIMATELY 3,500 ORGANIZATIONS.”



“OUR BUSINESS INTEGRITY AND COMPLIANCE TEAM CONTINUES TO IMPLEMENT RISK-BASED DUE DILIGENCE OF SELECTED DIRECT SUPPLIERS VIA OUR THIRD-PARTY RISK MANAGEMENT PLATFORM, EXIGER, TO BETTER UNDERSTAND ITS MODERN SLAVERY RISK PROFILE. EXIGER HAS BEEN DESIGNED TO ASSESS POTENTIAL HUMAN RIGHTS RISKS BY APPLYING WEIGHTING AND SCORING METHODOLOGY AGAINST UNIVERSALLY RECOGNISED HUMAN RIGHTS RISK INDICES.”



“DUE DILIGENCE ON CLIENTS AND SUPPLIERS IS UNDERTAKEN THROUGH ... THE INFORMATION REVEALED THROUGH EXIGER”



“EXIGER TOOL COMPLIANCE SCREENING: SINCE SEPT. 2019, THE GROUP HAS IMPLEMENTED COMPREHENSIVE INTER-FUNCTIONAL COMPLIANCE SCREENING FOR SPECIFIC CATEGORIES OF INDIRECT MATERIALS, WITH THE AIM OF ENSURING TRANSPARENT AND ETHICAL BUSINESS RELATIONSHIPS.”



“IN 2022 THE GROUP ROLLED OUT ITS SUPPLY CHAIN MANAGEMENT SYSTEM IN PARTNERSHIP WITH EXIGER ... USING THE INFORMATION COLLECTED TO MAP OUR GOODS FOR RESALE SUPPLY - THE BUSINESS HAS APPROACHED ALL EXISTING AND NEW SUPPLIER PARTNERS WHO HAD IN EXCESS OF £100,000 OF BUSINESS WITH THE GROUP IN THE FINANCIAL YEAR.”



“WE HAVE MANDATED, WHERE APPROPRIATE, THAT OUR SUPPLIERS BE SCREENED AGAINST A LIST OF CRITERIA VIA OUR THIRD-PARTY RISK MANAGEMENT SOFTWARE, EXIGER.”



“MODERN SLAVERY RISKS RELATED TO OUR BUSINESS RELATIONSHIPS ARE ASSESSED VIA THE USE OF ARTIFICIAL INTELLIGENCE AND ON-GOING MONITORING THROUGH THE AL SOFTWARE CALLED EXIGER DDIQ”



“FOR THE SUPPLIERS WE CATEGORISE AS ‘HIGH RISK’ WE CONDUCT ONGOING MONITORING THROUGH A DUE DILIGENCE SERVICE PROVIDED BY EXIGER”



“ALL HIGH-RISK SUPPLIERS ALSO UNDERGO DUE DILIGENCE SCREENING VIA A SYSTEM CALLED ‘EXIGER’ TO DETECT POTENTIAL LEGAL, ETHICAL AND REPUTATIONAL RISKS”



“HIGH-RISK SUPPLIERS ARE ALSO CONTINUOUSLY MONITORED USING OTHER PROCUREMENT TOOLS SUCH AS EXIGER”



Actions Taken to Assess and Address Identified Modern Slavery Risks (continued)

OUR MODERN SLAVERY RISK ASSESSMENT AND SUPPLIER DUE DILIGENCE ECOSYSTEM

Our modern slavery risk assessment and supplier due diligence ecosystem have been designed to align with our broader, Group-wide risk management framework. This alignment helps to ensure consistency in the application and common understanding of risk management across the Group. The six key pillars – identify; assess; mitigate; remediate; communicate; and monitor – are well embedded and, collectively, form our approach to managing human rights risk within our supply chain. These six pillars are outlined below.

1 IDENTIFY

The initial supply chain assessment includes questions that assess key modern slavery risk criteria, such as the location(s) where the product or service is both manufactured and provided, the sector, the category of product or service and how it is to be used by the Group. Where a potential human rights risk is identified (including in relation to modern slavery), our Group Procurement team enters the supplier details into our third-party technology platform (Exiger) and the supplier risk is referred to the Business Integrity and Compliance risk SME for triage. We utilise a range of tools to strengthen our risk assessment program, including indices

from reputable third-party providers and the Global Slavery Index and Exiger draws on a variety of data feeds including corporate records (e.g. Lexus nexus, Buerau Van Dijk), regulatory sources, watchlists (e.g. world compliance, info4c) and open web or media paywalled content, all of which inform our broader assessment. We also consider information and resources made available through organisations such as the Global Compact Network Australia, the Transparency International Corruption Perceptions Index, and the UK Government Modern Slavery Registry.

2 ASSESS

Exiger has been designed to assess potential human rights risks by applying weighting and scoring methodology against universally recognized human rights risk indices (such as civil and political rights, labour standards, access to remedy and business integrity), tailored to our operating environment. The initial assessment of risk is based on three key inputs: the responses to the initial triage questionnaire described in the previous step; the output of Exiger's negative screening capability; and a subsequent preliminary risk assessment which is completed by the sourcing business unit. Where a potential modern slavery risk is evaluated as medium or above, or where deemed appropriate due to the potential risk (for example this may include instances where the risk model has returned a low risk, but the product or service may be in a procurement category we consider as being associated with a potentially higher risk of modern slavery), the supplier is subjected to a modern slavery desktop assessment. This

assessment is undertaken by a modern slavery risk SME in the Business Integrity and Compliance function and requires the supplier to answer more in-depth questions in respect of its operations, including the countries and site/s from where the product or service is manufactured or provided. The supplier is required to provide supporting evidence, such as relevant internal policies and procedures, independent site/factory audit reports and evidence of labour practices (overtime, wages, worker conditions). In some instances, the Group will sponsor an independent audit of the supplier's operations or undertake a site visit (see page 35). In some countries, we may experience challenges working with suppliers to complete our supply chain assessment questionnaire due to language and cultural barriers. Geopolitical factors may also affect suppliers' willingness to engage with us. The due diligence case study on page 37 outlines examples of how we approach due diligence in challenging contexts.

3 - 5 MITIGATE / REMEDIATE / COMMUNICATE

In line with the UNGPs, we favour working with suppliers to resolve or substantially mitigate issues identified through our risk assessment and supplier due diligence processes. We recognise the importance of using our leverage to drive change to supplier practices and understand that immediately ending supplier relationships can have potential adverse effects on the livelihood of the supplier's employees. Achieving change

in supply chains takes time, is not always a linear process and can be complex, which is why we seek to share our expertise to support suppliers to build their capability to meet international standards, including in relation to modern slavery (see the case study on page 36). Further information about our Group specific remediation processes is set out in the following section.

6 MONITOR

Suppliers that are referred to Exiger and subsequently approved for onboarding, are subjected to continuous monitoring regardless of risk rating. This monitoring activity provides auto-generated alerts of any publicly available negative news screening across a range of categories that

include human rights violations, corruption, legal breaches and allegations of misconduct. This enables us to review and, if necessary, undertake appropriate action with the supplier in a timely manner.

MONITORING RISK IN OUR SUPPLY CHAIN: COTTON

Cotton is a commonly used fibre in our uniform apparel items as well as other inflight products such as sleeper suits, linen, blankets and pillows. Although our spend on these items is only approximately two per cent of our overall annual procurement spend, we know that spend is not an indicator of potential modern slavery risk. As part of our ongoing monitoring of suppliers, we scan external sources for potential changes in operating risk. In the reporting period, the Australian Government issued a Ministerial Statement in relation to the findings of the Office of the High Commissioner for Human Rights' (OHCHR) report on the Xinjiang Uygur Autonomous Region²⁵.

Whilst none of the factories manufacturing products for Qantas are located in the Xinjiang Uygur Autonomous Region,

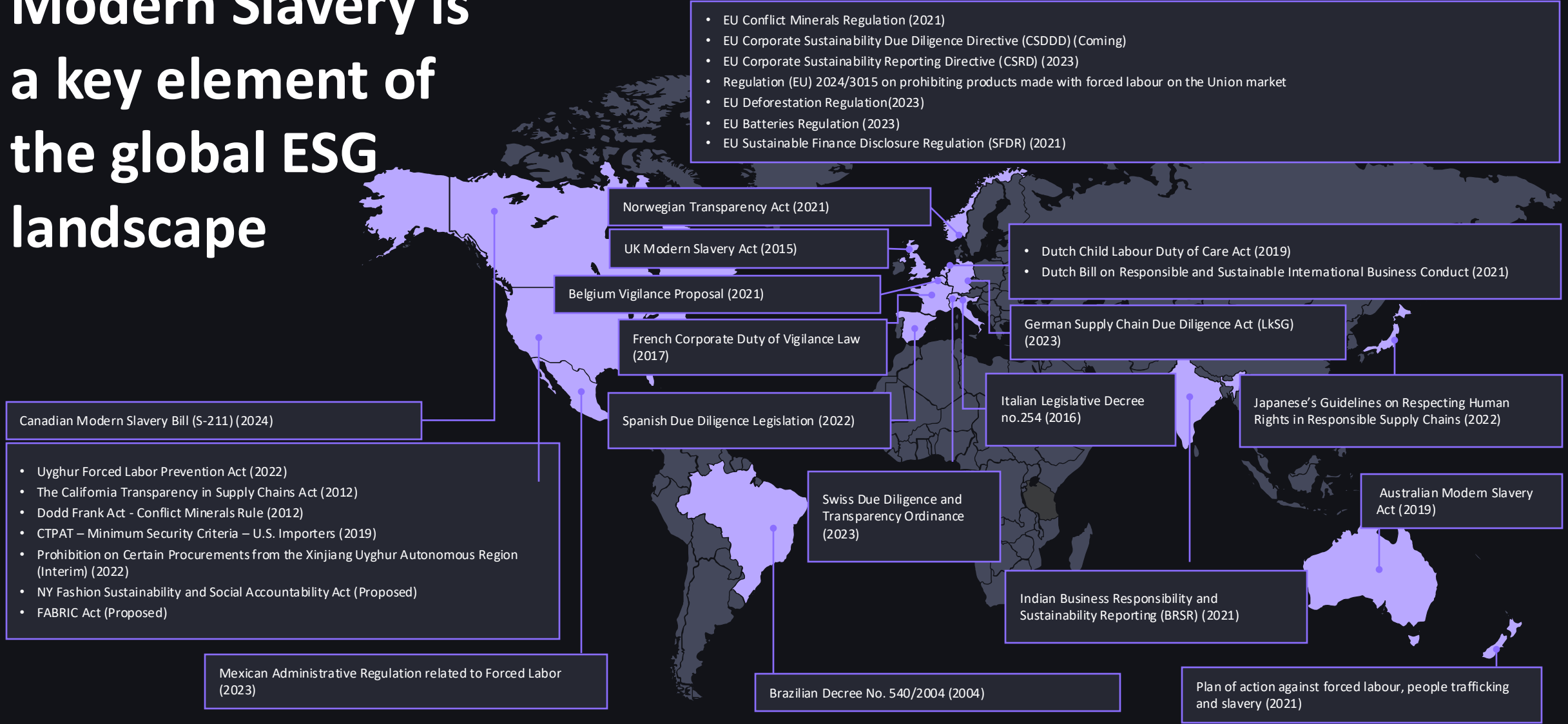
in response to the Ministerial Statement we proactively engaged our key apparel and textile suppliers to reaffirm that none of the raw materials it processes originates from this region. This activity also served to reaffirm our expectations of supply partners in relation to sustainable sourcing and, in some instances, provided us an opportunity to learn more about our suppliers' approach to managing potential modern slavery risks associated with cotton and other raw materials. For example, one of the suppliers identified it is monitoring research and analysis by credible third-parties to support it to track and manage risks relating to state-sponsored forced labour, and to refine its risk assessment and due diligence processes to address these risks.



Regulatory Review



Modern Slavery is a key element of the global ESG landscape



Canadian Modern Slavery Bill (S-211) (2024)

- Uyghur Forced Labor Prevention Act (2022)
- The California Transparency in Supply Chains Act (2012)
- Dodd Frank Act - Conflict Minerals Rule (2012)
- CTPAT – Minimum Security Criteria – U.S. Importers (2019)
- Prohibition on Certain Procurements from the Xinjiang Uyghur Autonomous Region (Interim) (2022)
- NY Fashion Sustainability and Social Accountability Act (Proposed)
- FABRIC Act (Proposed)

Mexican Administrative Regulation related to Forced Labor (2023)

Norwegian Transparency Act (2021)

UK Modern Slavery Act (2015)

Belgium Vigilance Proposal (2021)

French Corporate Duty of Vigilance Law (2017)

Spanish Due Diligence Legislation (2022)

Swiss Due Diligence and Transparency Ordinance (2023)

Brazilian Decree No. 540/2004 (2004)

- EU Conflict Minerals Regulation (2021)
- EU Corporate Sustainability Due Diligence Directive (CSDDD) (Coming)
- EU Corporate Sustainability Reporting Directive (CSRD) (2023)
- Regulation (EU) 2024/3015 on prohibiting products made with forced labour on the Union market
- EU Deforestation Regulation (2023)
- EU Batteries Regulation (2023)
- EU Sustainable Finance Disclosure Regulation (SFDR) (2021)

- Dutch Child Labour Duty of Care Act (2019)
- Dutch Bill on Responsible and Sustainable International Business Conduct (2021)

German Supply Chain Due Diligence Act (LkSG) (2023)

Italian Legislative Decree no.254 (2016)

Indian Business Responsibility and Sustainability Reporting (BRSR) (2021)

Japanese's Guidelines on Respecting Human Rights in Responsible Supply Chains (2022)

Australian Modern Slavery Act (2019)

Plan of action against forced labour, people trafficking and slavery (2021)



Common Questions from our Customers

How do I balance conflicting requirements across jurisdictions that I operate?

What does an effective supply chain tracing program look like?

Is it practical to map our entire supply chain down to raw materials?

CTPAT calls for a risk-based analysis of end-to-end supply chains. What considerations should I consider as part of this analysis?

What is a sufficient level of due diligence to conduct on my direct and multi-tier suppliers?

How do I stand up a global program when compliance guidance is lacking or ambiguous?

I have limited resources, how can I manage a compliance program of this scale?



Bridging Policy to Action



Exiger's high level approach

Exiger partners with Customers through the design, implementation, and operation of its program



Program Design

- Data Collection and Normalization
- Supplier Prioritization Framework
- Regulatory Compliance Mapping
- Compliance Program Design

AI Supply Chain Mapping

- Entity Level AI Supply Chain Mapping
- Product Level AI Supply Chain Mapping for Key
- Preliminary review of network mapping to identify notable gaps to be prioritized for further diligence

Risk Assessment

- Risk model framework development
- Due Diligence and Risk Assessment on Priority Suppliers
- Preliminary review and adjudication of risk results, identify supplier for further review

Operationalize and Monitor

- Ongoing mapping to identify and assess additional entities
- Additional diligence and risk mitigation on high-risk entities
- Ongoing monitoring of risks for the full population of entities
- Ongoing monitoring of regulatory environment
- Identification of additional use cases and benefits



Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

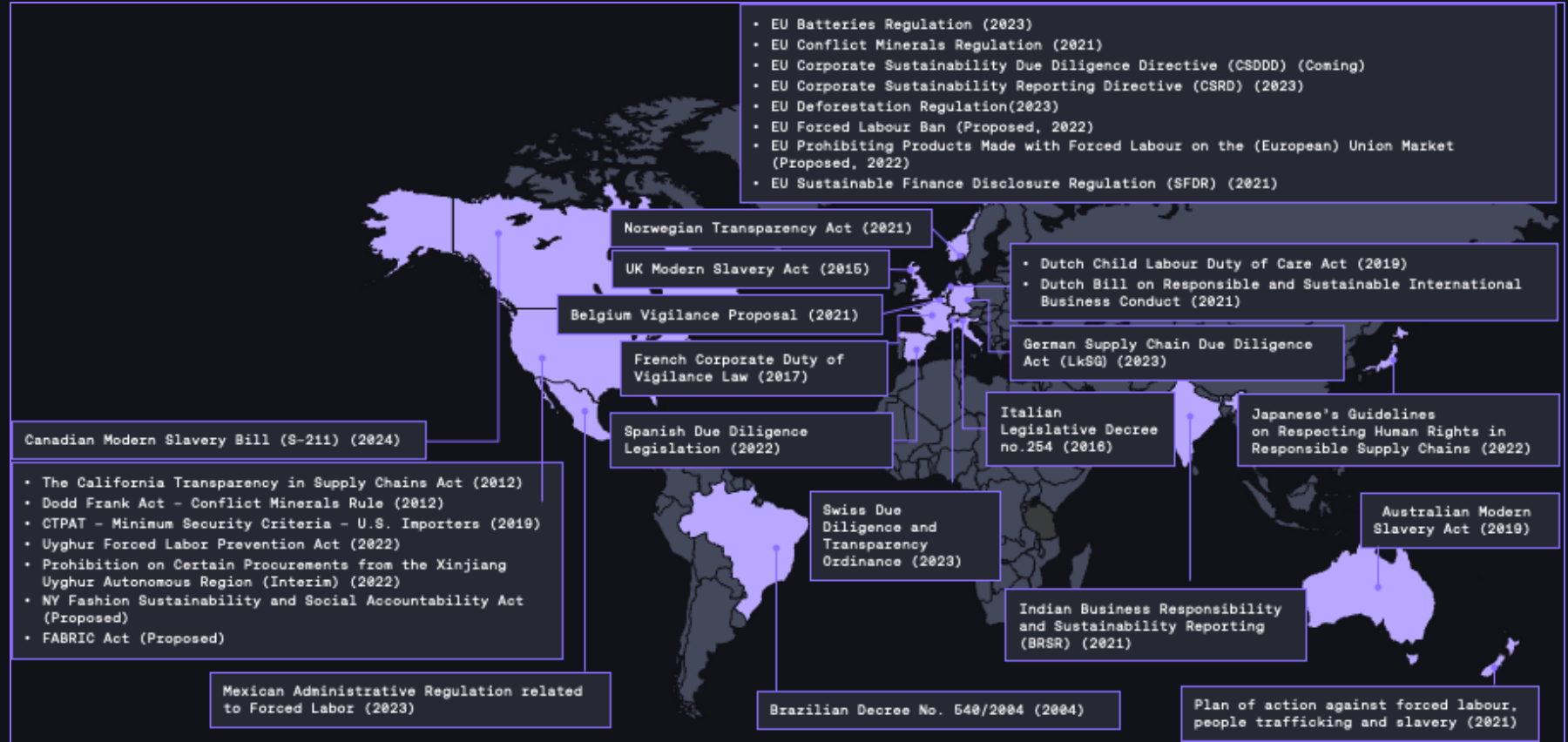
Regulatory Compliance Mapping

Approach Details

Using Customer’s customer, vendor, and facility master data the team will define the jurisdictional scope for review

Exiger’s team will compare this to its current regulatory baseline map to determine if there are any jurisdictional gaps and will perform a regulatory analysis to identify key compliance requirements.

The team will then perform an overlay analysis to determine applicability and prioritize program development based on enforcement timing and materiality of potential actions.





Program Design

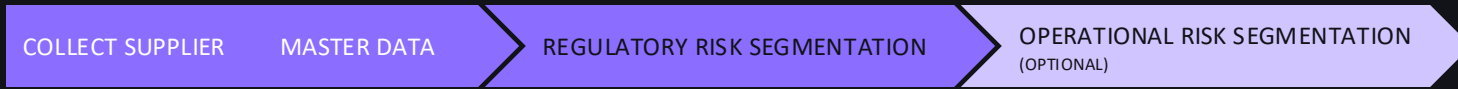
AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Third Party Entity Segmentation: Typical Segmentation Approach

Exiger recommends a risk-based approach to segmentation to quickly assess where the largest risk exposures exists



- Exiger provides Customer data request template to pull supplier master data for **full supplier population**
- Minimum seed data fields include **supplier name, address**
- Additional fields include **supplier website, DUNS No, Company Registration No**, accelerate entity resolution to **ensure quality matching**
- **Product description** information required to enable **product-level mapping** to reduce noise in automated mapping

Jurisdiction Risk Filter

- Flag **Tier 1 suppliers** with direct exposure to high-risk regions (e.g., China, Vietnam, Malaysia, Thailand, etc.)
- Flag suppliers with **T2+ risk exposure** to high-risk regions (using Exiger’s automated AI mapping)

Product Risk Filter

- Flag suppliers providing **goods** that contain **high-risk materials** (e.g., Aluminum, PVC, Electronics, Cotton, etc.)

Optional operational risk factors for consideration:

- **Supplier Spend**
- **Dependent Revenue** (orders using supplier’s parts)
- **Single Source Suppliers**
- **Supplier Performance** (e.g., on-time delivery, quality, lead time)
- **Concentration risk** (enabled by Exiger’s AI Product Mapping)
- Additional master data required depending on the criteria selected



- ✓ Highly scalable **screening** against structured watchlist and sanctions data sources is performed on **all suppliers**
- ✓ **Deeper diligence** including adverse media and unstructured data sources is performed on **priority suppliers** identified in the segmentation analysis as well as any suppliers that returned material risk from structured watchlist and sanctions screen
- ✓ **Operational risk** segmentation is performed on an **iterative** basis through the course of the project to refine the methodology to **align with Customer’s risk tolerance**



Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Compliance Program Design: Regulatory Overlap

Overlapping regulatory requirements provide an opportunity to streamline compliance efforts and eliminate redundant risk assessment and management activities by consolidating them into a holistic program

Key Regulatory Requirements & Expectations

	Due Diligence	Risk Management	Transparency and Reporting	Accountability and Governance	Stakeholder Engagement	Documentation and Auditing	Continuous Improvement	
Sample Regulations	1. CSDDD	Mandates human rights and environmental due diligence throughout the supply chain.	Requires companies to identify and manage human rights and environmental risks.	Companies must publicly report on their due diligence efforts and findings.	Mandates governance frameworks for overseeing due diligence.	Requires engagement with affected stakeholders, including workers and communities.	Mandates detailed record-keeping and, in some cases, external audits of due diligence.	Requires ongoing assessment and improvement of due diligence processes.
	2. CSRD	Requires due diligence reporting on ESG factors.	Companies need to report on risk management strategies for ESG issues.	Companies must disclose comprehensive sustainability information.	Requires governance frameworks to ensure accurate sustainability reporting.	Requires engagement with stakeholders to inform sustainability reporting.	Requires detailed sustainability reporting and auditing.	Requires ongoing enhancement of sustainability reporting and practices.
	3. UK Modern Slavery	Requires due diligence to identify and prevent modern slavery and human trafficking in operations and supply chains.	Requires implementation of policies and procedures to manage risks of modern slavery.	Companies must publish annual statements on their efforts to combat modern slavery.	Requires board-level oversight of modern slavery statements.	Encourages engagement with stakeholders to address modern slavery risks.	Requires documentation of efforts to combat modern slavery.	Encourages continuous improvement in addressing modern slavery risks.
	4. German Supply Chain Act	Mandates comprehensive human rights and environmental due diligence.	Companies must identify, assess, and mitigate human rights and environmental risks.	Requires regular reporting on due diligence measures and their effectiveness.	Requires governance structures to ensure compliance with due diligence obligations.	Mandates stakeholder engagement in due diligence processes.	Requires documentation and regular audits of due diligence practices.	Mandates continuous improvement of due diligence measures.
	5. UFLPA	Rebuttable presumption requires companies to collect evidence demonstrating no forced labor exists in supply chain	Companies must manage risks related to forced labor in their supply chains.	Companies must be able to identify the parts of their supply chain most at risk and	Requires governance measures to enforce policies.	Must provide training about compliance program requirements to their suppliers	Provide evidence of implementation of compliance program	Maintain a remediation plan in the event forced labor is identified

Exiger provides fit for purpose supply chain mapping approaches

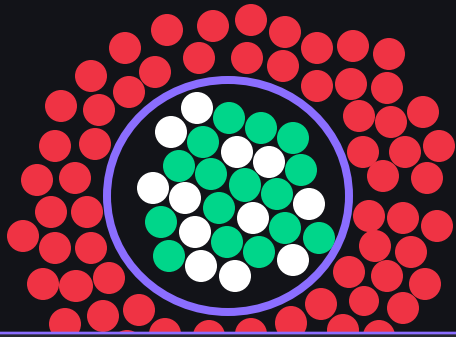
Proprietary & Restricted

Program Design

AI Supply Chain Mapping

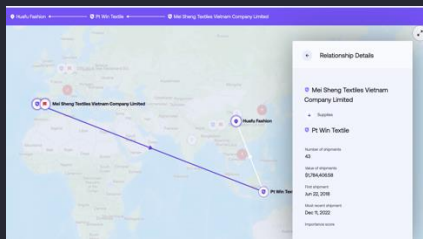
Risk Assessment

Operationalize and Monitor



ENTITY LEVEL MAPPING

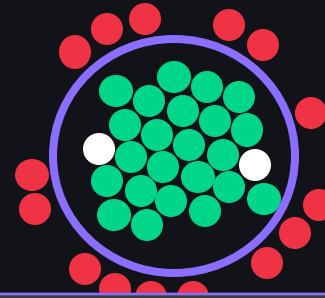
Open-sourced supply network mapping at the entity level using commerce data



BUYER

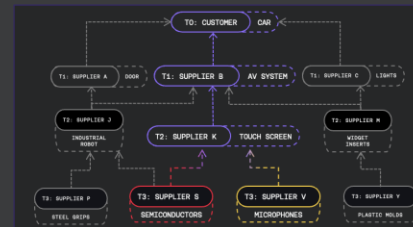


SUPPLIER



AI PRODUCT MAPPING

Supply chain mapping at the product level using GenAI

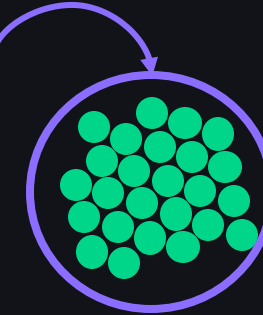


SUPPLIER + BOM



PRODUCT-BASED MAP

Actual Nth Tier Supply Network (Illustrative)



VALIDATED BOM MAPPING

Supply chain mapping using known and validated internal data or by collaborating with suppliers



AUTOMATED BOM



VALIDATED BOM

Speed

Precision



Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Entity Level Mapping

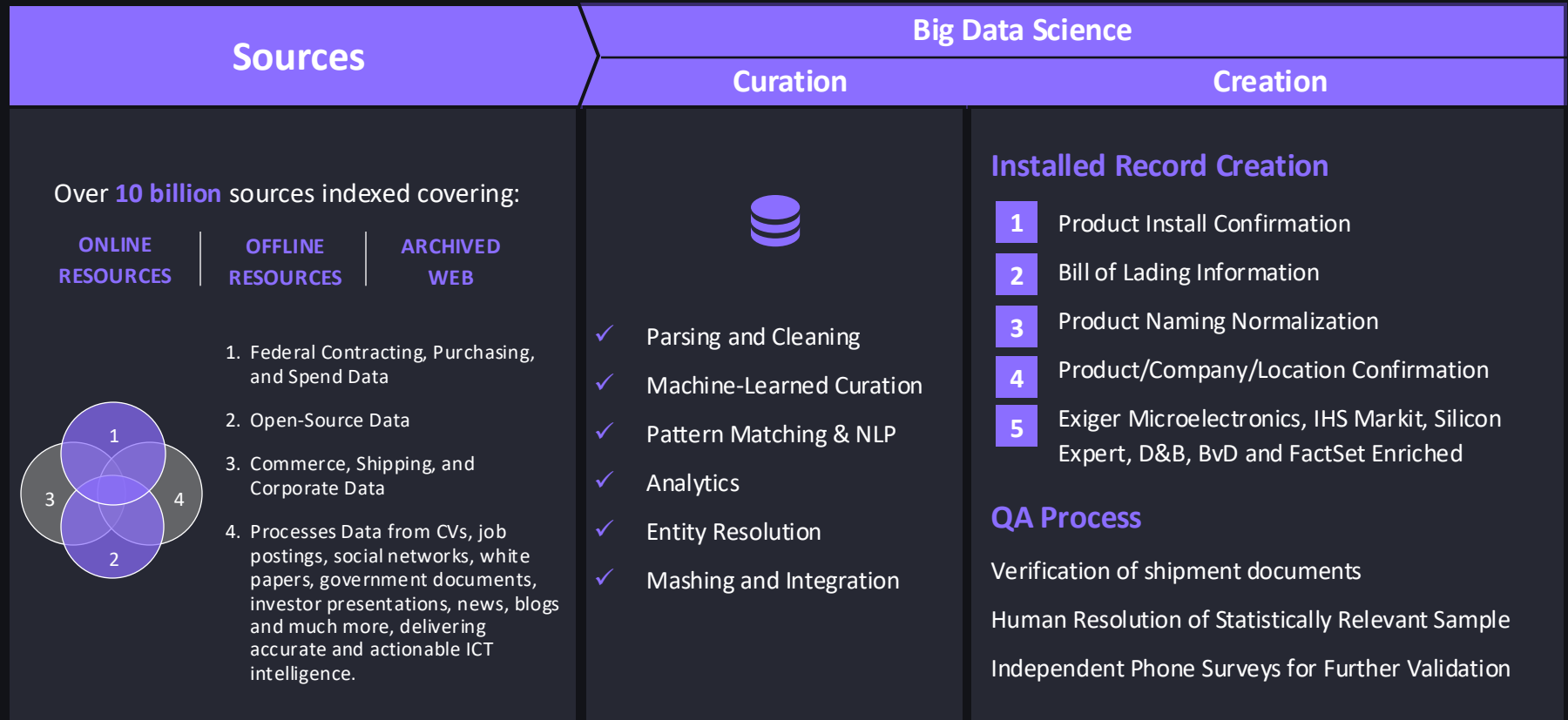
Exiger has developed the world's largest database of entity level relationships which is continuously growing as we collect additional evidence, curate our knowledge graph, and generate new records that are then available to our customers

Approach Details

Exiger loads prioritized suppliers into 1Exiger platform for preliminary entity level mapping

Exiger performs preliminary assessment to identify data gaps

Data enrichment / validation performed to expand population of mapping hits





Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Rapid, automated mapping of multi-tier supply chains using explainable AI

Home > News > Industry

Atlis Just Pulled the Rug From Under Tesla's Feet, Here's the MegaCharger in Action

Published: 22 Feb 2023, 21:48 UTC | By: Florin Amariei

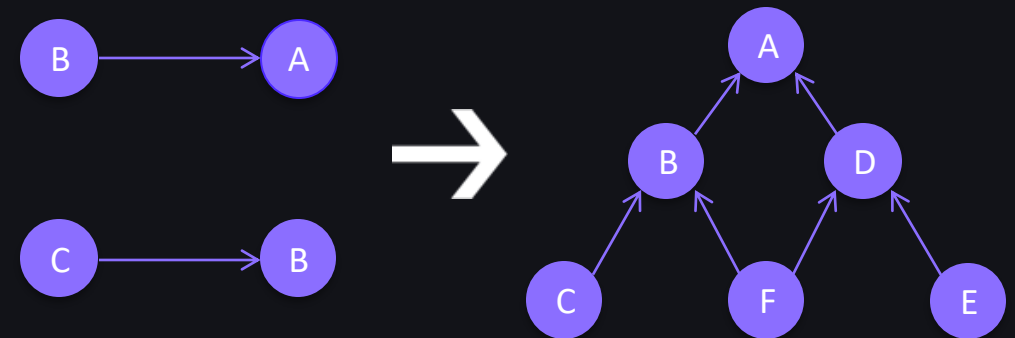
The much-hyped Tesla Semi started being delivered to PepsiCo after a three-year delay. But now, the marque is in another pickle because almost three months have passed since the first semitrailer trucks

Evidence Source: <https://www.autoevolution.com/news/atlis-just-pulled-the-rug-from-under-tesla-s-feet-here-s-the-megacharger-in-action-210775.html>

Evidence Date: 22 February 2023

Evidence Text:

"The much-awaited Tesla Semi started being delivered to PepsiCo after a three-year delay"





Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

AI Product-Level Mapping: Automated Bill of Material (BOM) Generation



Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

AI Product-Level Mapping: Automated Bill of Material (BOM) Generation

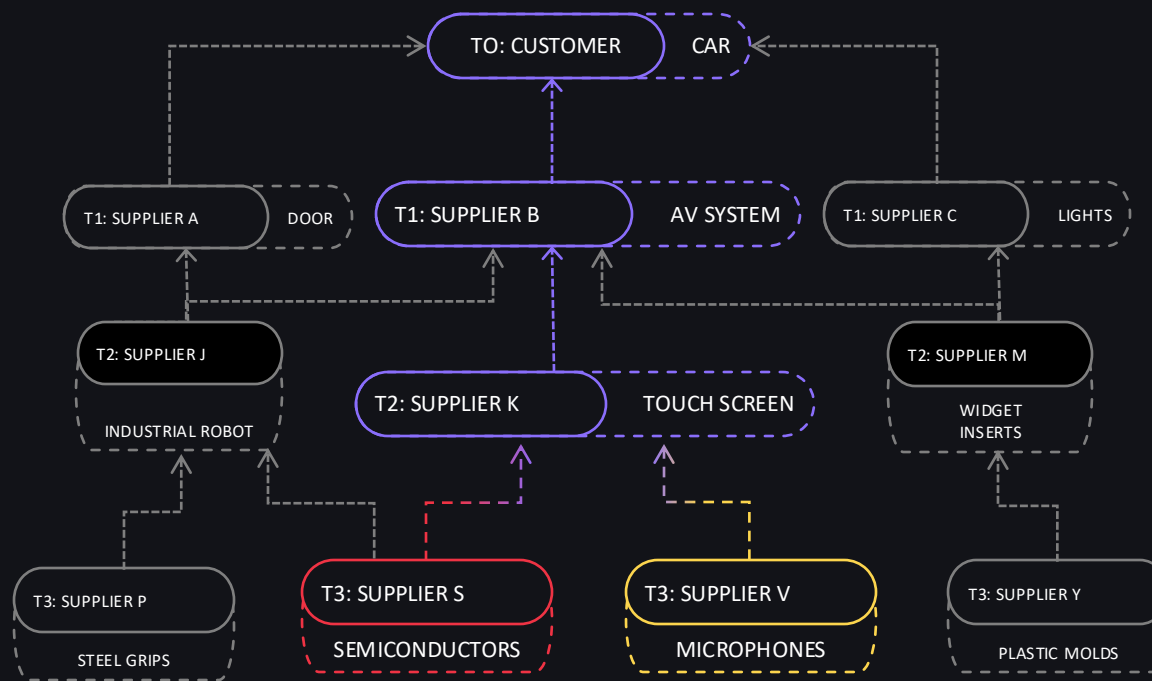
Approach Details

Exiger overlays the product BOM mapping over its entity level supply chain knowledge graph to generate a hyper-relevant multi-tier supply chain mapping relationships

Suppliers providing irrelevant materials are excluded from the supply chain map to reduce noise and focus the team's efforts on the suppliers that represent the most significant risk exposure to Customer

Bill of Materials Mapping

BoM-based mapping excludes suppliers of irrelevant products...helping you triage your suppliers faster





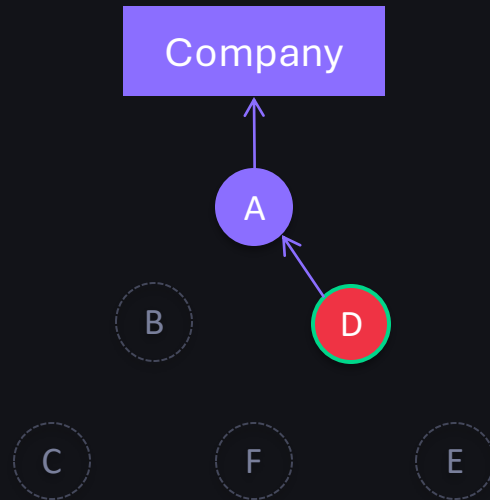
Program Design

AI Supply Chain Mapping

Risk Assessment

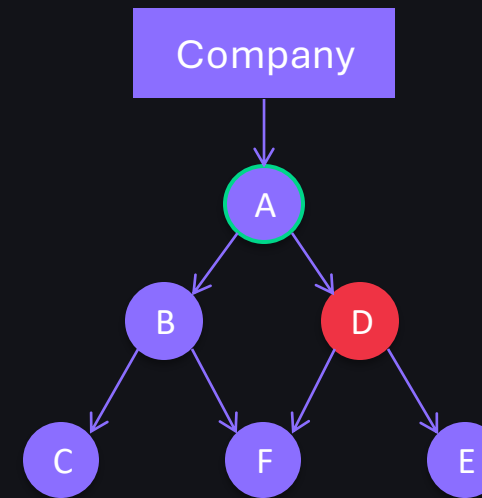
Operationalize and Monitor

Other Providers



1. Identifies high risk companies
2. Identifies downstream companies (2 levels)

Exiger



1. Map upstream supply chains to direct suppliers (to Tier n)
2. Risk assess all sub-suppliers

Start point



High risk supplier





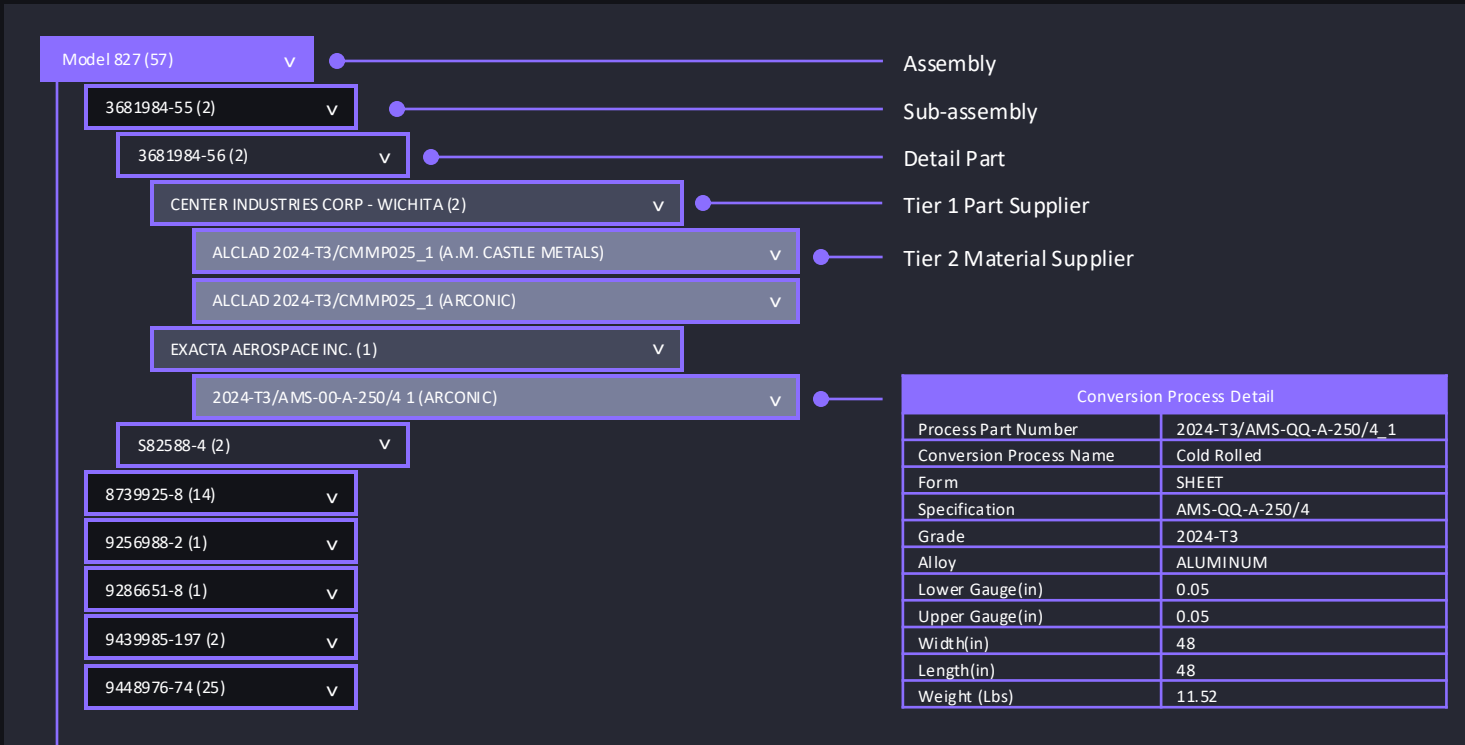
Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Validated Bill of Materials Mapping





Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Framework Development: Risk Dimensions

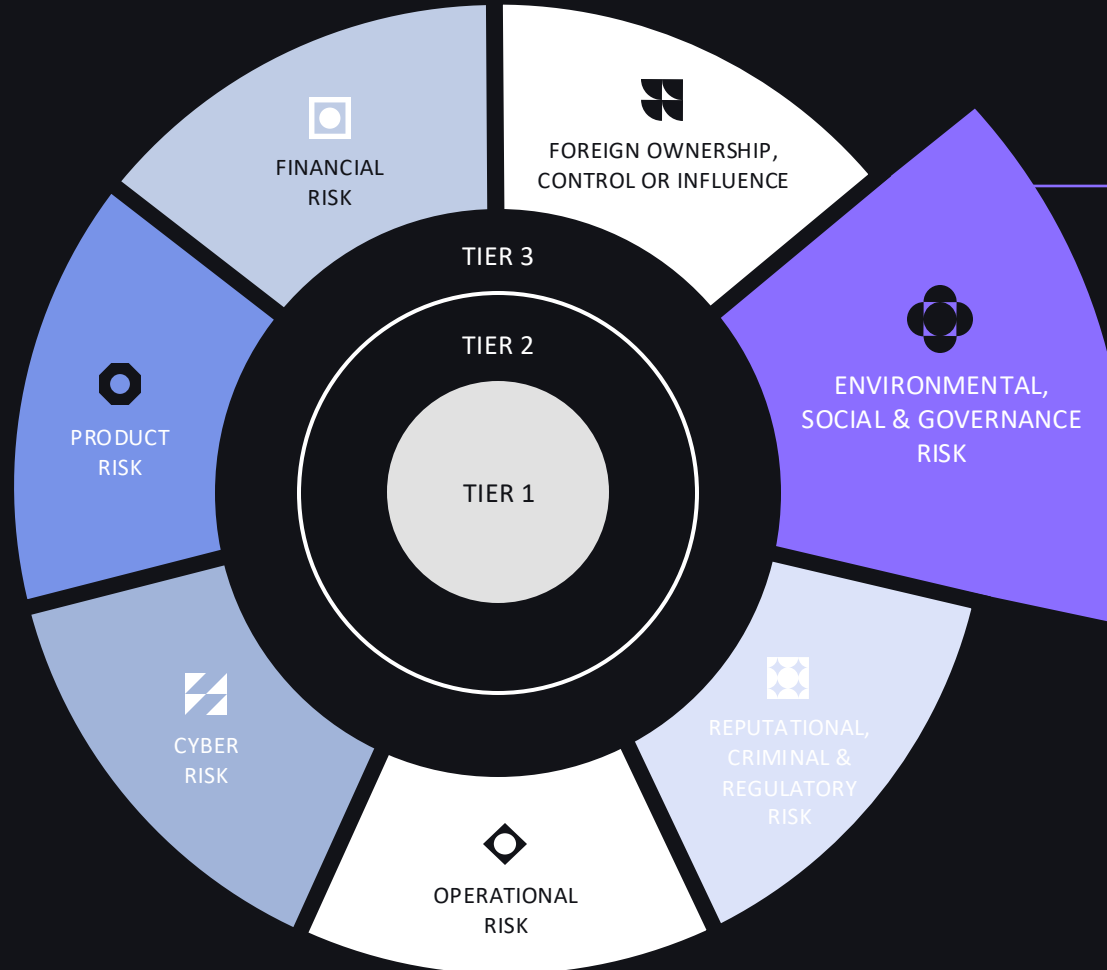
Customer will have flexibility to select the risk dimensions and risk events that are most relevant to its business

Approach Details

Exiger will use the results from the regulatory mapping exercise to inform which risk dimensions are selected for Customer's risk model

Once the dimensions are selected, Exiger will recommend which of the 300+ risk event types should be included based on our experience with automotive suppliers.

Exiger and Customer will collectively agree on the risk framework to serve as a starting point for risk assessment.



Environmental

Greenhouse Gas Emission

- Carbon Emission Impact

Environment Concerns

- Deforestation
- Pollution & Waste

- Recycling and circularity
- Animal rights & trafficking
- Water conservation and management

Social

Ethical Concerns

- Modern slavery
- Human rights
- Human Trafficking
- Child Labor
- Conflict Minerals

Health and Safety

- Product & Workplace Safety

Community Contribution

- Workplace diversity, equity and inclusion
- Supporting local businesses and communities
- Supporting charities and social enterprises
- Promoting employment

Labor Practices

- Discrimination
- Workers Rights
- Fair wages

Governance

Leadership

- C-Level changes
- Board of Directors
- Management team members backgrounds

Business Footprint

- Business in high-risk Countries

Financial

- Layoffs
- Liquidity problems

Policies & Procedures

- Compliance with Laws & Regulations

Supplier Governance

- Supply chain oversight
- Treatment of suppliers
- Cyber controls

Ethical Concerns

- Fraud corruption and sanctions
- Money laundering
- Tax evasion



Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Risk Data Layer

Exiger's platform provides a dynamic single view of third-party risk utilizing a proprietary aggregated blend of internal and external data sets, monitored and updated for network and material risk changes.

Data Sources:

16,000+ structured,
31M+ unstructured data
sources and **10B** supply
chain records



On The Ground

Information gathered from people that know about the subject or topic at hand, including auditors, sources, employees, etc

- Surveys
- Whistleblowers
- Source Inquiries
- Audit



Open Source

Data gathered from public sources that is published from the work of various parties including regulators, journalists, investigators, etc.

- Corporate Records
- Ownership Data
- Commerce Data
- Watchlist
- Adverse Media
- Open Web



Third-party

Information gathered directly from third-party suppliers through questionnaires, attestations, or other methods.

- Attestations
- Policies
- Questionnaires



Internal

Information gathered internally on the relationship type, size, and plan along with internal blacklists and documentation.



Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Automated due diligence for modern slavery screening

- All scopes of Exiger’s automated due diligence is powered by our proprietary due diligence engine, DDIQ (due diligence IQ).
- DDIQ searches thousands of data sources, in English and in 96 languages (as relevant), in minutes, and leverages Natural Language Processing and Machine Learning (AI) to build a profile of a target entity or person.
- The Exiger Proactive Intelligence Watchlist aims to detect and identify risky persons, entities, products, and materials through a comprehensive repository, integrating various approved watchlists created by Exiger, governments, or other entities into an authoritative repository to enhance proactive measures
- Use Cases:
 - **ScreenIQ:** High-level watchlist and sanctions screening
 - **DDIQ:** Entities with identified higher risks are run through a specialized risk-focused DDIQ crawl plan to assess the risk

Tier 1 & High Risk Subtiers
DDIQ

Subtier Suppliers
ScreenIQ

Watchlists, Sanctions, and Political Exposure	★	★
General Background Information	★	
Regulatory actions and adverse information	★	
Adverse media in English and local-languages	★	
Legal references in media or data aggregators (not comprehensive)	★	
Exiger Proactive Intelligence (see appendix for details)	★	★
Specialized Crawl Plan	★	



Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Exiger's Proactive Intelligence Capabilities

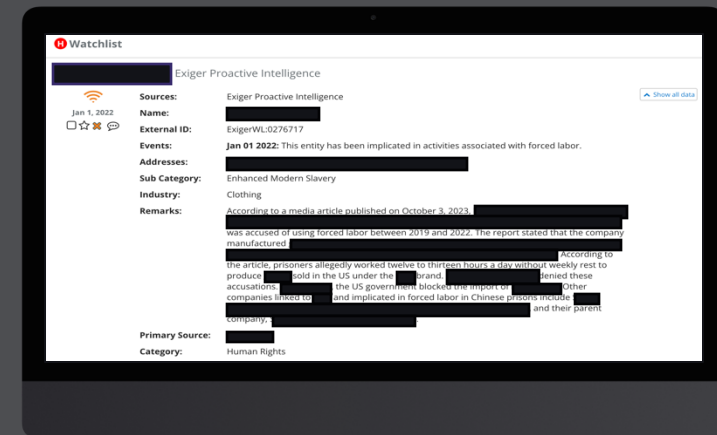
Proactive Intelligence serves as an advanced overlay on top of 1Exiger, providing customers a real-time operational control experience to see how different events will impact them upstream, taking into account regulatory requirements, unique industry constraints, key associations, potential vulnerabilities and breaking developments as they unfold. Harnessing the power of Exiger's AI, the advanced automated capability combines firmographic data, regulatory mapping and LLMs

350,000 +

Entities added in 2024

Enhanced Modern Slavery Spotlight

Exiger defines "Enhanced Modern Slavery" as refining, verifying, and integrating data through expert human analysis across a variety of sources, resulting in a unique, proprietary dataset. Our innovative proactive searching capability leverages open-source intelligence in multiple languages to offer scalable forced labor solutions, helping prevent disruptions and mitigate reputational risks. Our Forced Labor dataset simplifies regulatory navigation, integrates with supply chain platforms, and aids in uncovering and addressing forced labor and human rights risks to avoid regulatory and reputational consequences.





Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Exiger Proactive Intelligence Watchlist

Representative Sources for Modern Slavery

NAME	DESCRIPTION
Enhanced Modern Slavery	<p>The Enhanced Modern Slavery watchlist identifies companies accused of or connected to modern slavery. Exiger "enhances" by refining, verifying, and integrating data through expert human analysis across a variety of sources, resulting in a unique, proprietary dataset. Sources include - but are not limited to - academic, non-governmental, and independent research; government publications; and publicly available media.</p> <p>Certain industries are prone to modern slavery such as Agriculture, Textiles/Garments, and Mining. As information is collected through Exiger research across languages, the Enhanced Modern Slavery list captures entities that may not be present in other available structured data sources.</p>
Sheffield Watchlist	<p>Watchlist containing over 50,000 companies that operate in the Xinjiang Uyghur Autonomous Region ("XUAR") has been compiled and released by Sheffield Hallam University</p> <p>Watchlist is available in DDIQ, allowing users to identify companies linked to forced labor and human rights issues with the XUAR.</p>
Subsidiaries of DHS Entity List and Withhold Release Orders (WRO)	<p>This watchlist helps identify companies whose goods are banned from import due to concerns about forced labor. This list is essential for ensuring that subsidiaries of larger corporations are not engaging in practices that violate human rights standards. By tracking these entities, it supports compliance with international labor laws and prevents the entry of unethically produced goods into the market.</p>
Watchlist Unwrapping	<p>Specifically relates to illuminating the upstream corporate structure of certain proactive intelligence watchlist sources to capture all relationships.</p>

Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Exiger Client Alerts

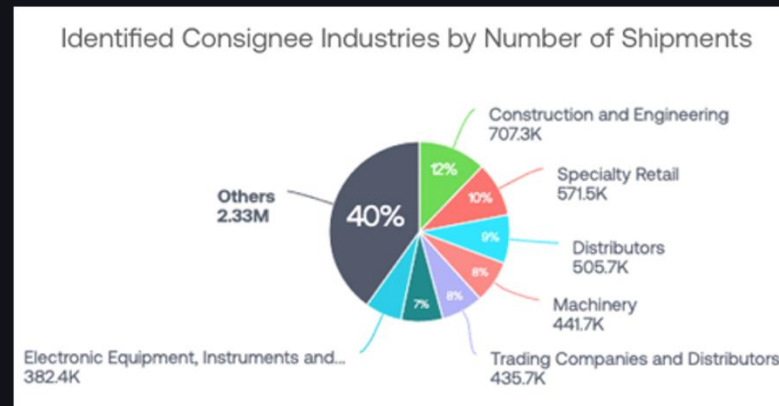
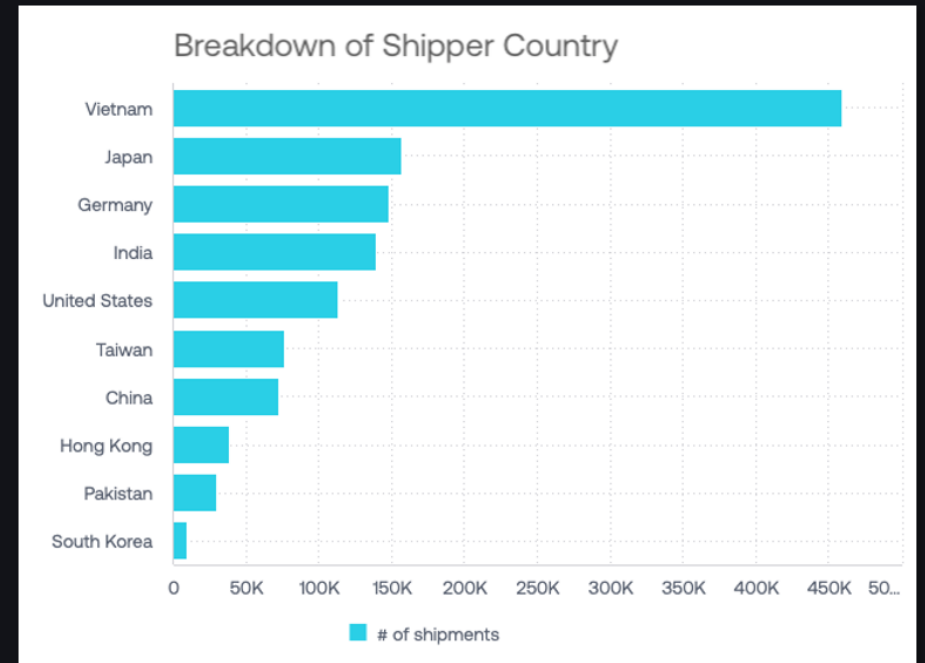
On January 14, 2025, the [Department of Homeland Security \(DHS\)](#) announced the addition of 37 entities based in the People’s Republic of China (PRC) to the [Uyghur Forced Labor Prevention Act \(UFLPA\)](#) Entity List

Exiger client alerts are distributed to clients and [published](#) on our website

Shipping Overview

Exiger identified 13.1 million shipments involving the newly added UFLPA entities or their direct or indirect subsidiaries since the start of 2024:

# OF SHIPMENTS	# OF UNIQUE SHIPPERS
13.1M	53,208
# OF UNIQUE CONSIGNEES	BUSINESS RELATIONSHIPS
88,905	113,537





Program Design

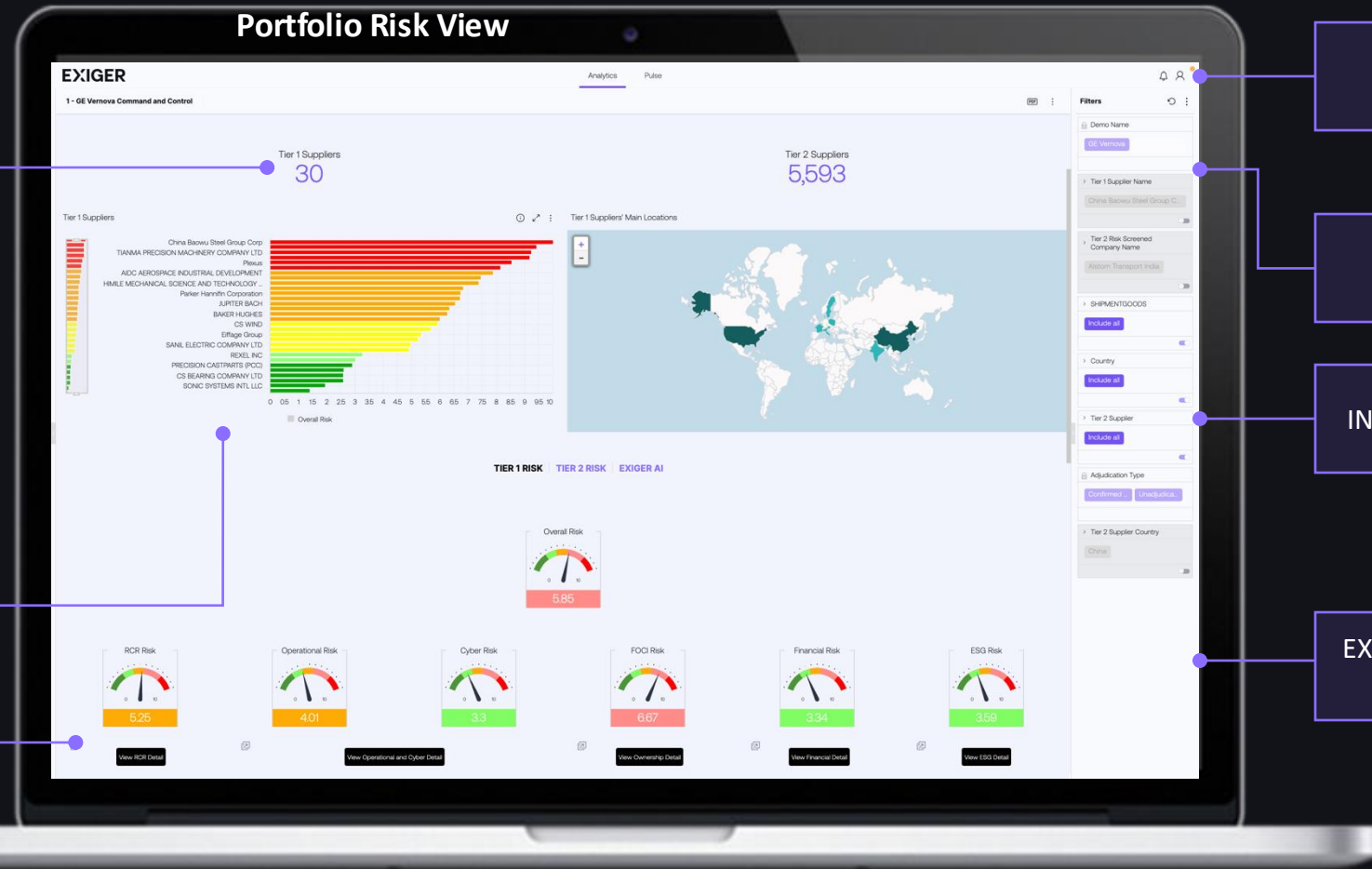
AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Ongoing Monitoring: Flexible UI/UX

1Exiger has a highly flexible UI/UX that will be configured to support operationalizing Customer's program and drive process discipline



ROLE BASED ACCESS CONTROL

DYNAMIC FILTERING

IN-PLATFORM ALERTING

EXPORTABLE (API, EXCEL, CSV)

PERSONA BASED DASHBOARDS

CONFIGURABLE WIDGETS / LAYOUT

DRILL-DOWN TO SOURCE DETAILS



Program Design

AI Supply Chain Mapping

Risk Assessment

Operationalize and Monitor

Workflow, Monitoring, and Alerting

Customer will have flexibility to configure custom reports and alerts to help manage the program at scale

Approach Details

Exiger will leverage its workflow capabilities for targeted supplier outreach and evidence collection to support ongoing mapping and diligence activities.

Workflows, processes, document collection, and reporting can all be done directly within the 1Exiger platform.

Customer users are also able to order enhanced due diligence products from the platform should deeper dive support be required.



COLLECT INFORMATION THROUGH EASILY CONFIGURABLE DIGITAL QUESTIONNAIRES. TRACK A SUBJECT'S PROGRESS, RISK-RANK RESPONSES, AND REFRESH PROFILES WITH A CLICK OF A BUTTON

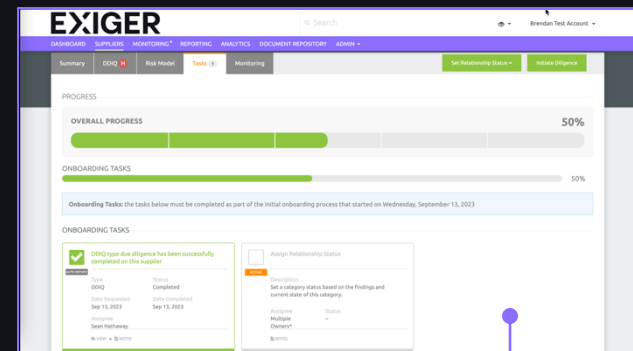


USING A LAYERED AND CONFIGURABLE SCORING, MEASURES RISK AGAINST A COMPANY'S TOLERANCES, WHICH CAN BE ADJUSTED OVER TIME AS THE PROGRAM EVOLVES

SEAMLESS ACCESS TO THIRD-PARTY REPORTS

DATE CREATED	CLIENT ACCOUNT	STATUS	REPORT TYPE	COMPLETION DATE	DDIQ
9/30/2023	Medium Risk Suppliers	Completed	DDIQ	9/13/2023	DDIQ
9/13/2023	Vendors	Completed	DDIQ	8/30/2023	DDIQ
8/30/2023	Vendors	Completed	DDIQ	8/16/2023	DDIQ
8/16/2023	Vendors	Completed	DDIQ	7/31/2023	-
7/31/2023	Medium Risk Suppliers	Test	-	-	-
7/20/2023	Partners	Test	-	-	-
7/19/2023	Vendors	Completed	DDIQ	7/19/2023	DDIQ
7/7/2023	Low Risk Suppliers	Test	-	-	-
6/15/2023	Vendors	Questionnaire Send Failed	Counterparty Onboarding Questionnaire	-	DDIQ
6/15/2023	Tier 1 Suppliers Project	Questionnaire + DDIQ Sent	Supplier Questionnaire + DDIQ	-	-

FROM THE DASHBOARD, GET STATUS, CONTROL RISK SEGMENTS, DIRECT WORKFLOWS, AND APPROVALS



EMBEDS INTO THE ECOSYSTEM OF AN ORGANIZATION TO SEAMLESSLY INTEGRATE EXIGER'S PRODUCTS INTO ALL OF ITS CUSTOMERS' THIRD-PARTY WORKFLOWS

Actionable workflows for risk validation, mitigation, and reporting



Software Demonstration



Thank You

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Manufacturing & Energy

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