

ANTI-SLAVERY AND ANTI-TRAFFICKING STATEMENT 2023

FORSILIUS LIMITED is the legal entity responsible for the management and operation of the digital Platform, which can be accessed at the web address <https://nymph.club> (hereinafter referred to as "Nymph", "Platform"). Nymph is a social Platform that is dedicated to transforming the way authors and fans interact. The Platform is designed to be welcoming for Customers from various backgrounds and it empowers authors to realize their full potential, consistent with the principles and objectives of Nymph.¹

Nymph is actively committing to combatting contemporary forms of slavery. We are establishing safe global digital media Platform, and we denounce any forms of modern slavery or human trafficking on our Platform, within our partnerships, or within our supply chain.

This declaration is made in accordance with our Nymph's principles and objectives and in line with the UK Modern Slavery Act, Australia Modern Slavery Act, and the California Transparency in Supply Chains Act. It outlines the actions Nymph has taken to prevent modern slavery and human trafficking from occurring in our business operations, collaborations, and supply chains.

Commitment

Nymph is against all types of modern slavery and human trafficking. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or financial gain.

We are dedicated to conduct our business with integrity and actively reducing the risk of modern slavery and human trafficking in our interactions and collaborations with our authors and fans. Furthermore, we are committed to treating every employee, partner, and supplier with the respect and dignity, ensuring the provision of safe working conditions, and conducting our operations in a manner that is both ethical and environmentally responsible.

Actions Taken to Prevent, Identify, and Report Risks Related to Modern Slavery and Human Trafficking

Steps we are taking and plan to take:

1. Conducted a comprehensive review of our supply chain to identify and mitigate the risks associated with modern slavery and human trafficking;
2. Implemented mandatory training on modern slavery and trafficking;
3. Established policies and procedures outlining acceptable business practices and ethical conduct;
4. Made significant investments in enhancing our content moderation approach, including hiring specialized resources;

¹ Core Principles: Respect, Safety, Freedom of Expression, Integrity, Trust, Honesty, Transparency, Empowerment, Accountability

5. Appointed an independent monitor to assess our safety controls and compliance program, further enhancing the safety of our Platform;
6. Strengthened our collaborations with third-party organizations dedicated to combating modern slavery and human trafficking.

Policies

Nymph is deeply committed to taking reasonable and necessary measures to ensure the absence of any modern slavery or human trafficking activities within our Platform, business operations, and supply chain.

We expect that all employees demonstrate integrity and exercise good judgment and common sense in their efforts to comply with all applicable laws, rules, and regulations, including in relation to modern slavery and human trafficking.

This Anti-Slavery and Anti-Trafficking Statement sets out our overarching commitment to combating modern slavery and human trafficking. It outlines specific actions taken by Nymph to mitigate these risks and provides accessible reporting channels for suspected instances of modern slavery or human trafficking.

Our Terms of Use clearly prohibit Customers from uploading, posting, displaying, or publishing content on Nymph that:

1. Depicts, includes, or references to any other individual without obtaining written consent from each person to use their name or images (or both) in the content.
2. Displays, promotes, advertises, or refers to escort services, sex trafficking, or prostitution.

We maintain high standards for our employees and suppliers. Employee violations may result in disciplinary action, up to and including termination of employment. Similarly, supplier violations can lead to contract termination.

Our Risk Evaluation

We conduct continuous assessments of modern slavery and human trafficking risks within our business environment by identifying and examining high-risk areas of our operations. Our evaluation is guided by external reports, industry standards, and country-specific and sectorspecific risk profiles. We adapt our processes and controls as necessary, responding to evolving risks.

Our Direct Business Operations

We consider the risks of modern slavery and human trafficking to be relatively low within our direct business operations due to the professional qualifications and skills of our workforce. We ensure that our entire workforce is educated about these risks and our stance on these issues. We encourage them to report any suspected instances of modern slavery or human trafficking promptly.

Author Content

Similar to other social media platforms, our Platform faces risks associated with Author's content, including the potential upload of material that may violate various laws and our policies.

Contractors and Third Parties

We are planning to engage contractors and temporary staff for Platform services and rely on third-party suppliers to assist with tasks like Customers verification and content moderation. Despite our policies, these external parties might breach relevant laws or our guidelines.

Our Efforts in Risk Mitigation

We have persistently worked to mitigate the risks highlighted in our previous statements on modern slavery and human trafficking. Our commitment extends to reporting key action points that we plan to implement in the future.

Verification of Authors

We carefully review identity and payment details for each account application, ensuring that individuals create accounts only for themselves. We specifically check for any discrepancies between identity documents and the legal name provided on payment methods.

In certain high-risk jurisdictions or where an account has been flagged for additional security after our initial verification process has been completed, we require an additional "selfie" identification process to log into an account at specific intervals (which can include every log in).

Content Moderation

To prevent and identify harm, we are planning to actively monitor all Content uploaded to our Platform and promptly remove and report any Content that facilitates or coordinates the exploitation of individuals, including instances of modern slavery and human trafficking. Our ongoing efforts involve setting up our team of content moderators that undergoes comprehensive training to swiftly recognize and report suspected cases of modern slavery and trafficking.

It's important to note that we maintain the ability to review and remove any image or video shared on Nymph at any time.

Contractor Staff

We consistently incorporate contractual obligations for counterparties and temporary staff, ensuring compliance with applicable laws and our anti-modern slavery and anti-human trafficking policies.

Community Reporting and Support

We actively encourage individuals who encounter content on Nymph indicating immediate physical danger related to human trafficking to promptly report it to us at support@nymph.club. Moreover, we are planning to add report button for every post and account.

Law Enforcement

When Nymph identifies content containing potential modern slavery or human trafficking, we suspend the associated account. Thereafter, we are able to share this information with law enforcement agencies and non-governmental organizations to identify the offender.

Investments and Collaborative Partnerships

We consistently invest in enhancing our capability to detect content related to human exploitation. We have an ability to identify Customers, networks, organizations, and businesses engaged in these activities. We actively implement countermeasures on our Platforms and through external partnerships to prevent Customers and businesses from misusing our services for criminal activities.

Transparency and Accountability

Nymph takes full responsibility for its actions and is planning to regularly publish verifiable data confirming the measures are implementing. We are planning to establish an independent third-party monitor to assess our safety controls and compliance program.

Reporting Procedures

We promote a culture of transparency, honesty, and accountability, encouraging our employees to report any concerns or misconduct, including violations of human rights, modern slavery, and human trafficking. If you have any concerns or suspect a violation of any law by the Nymph, whether involving employees, contractors, agency staff, or any third party acting on the Nymph's behalf, please report the matter via email to support@nymph.club.

If concerns arise regarding a supplier or contractor, we will collaborate with relevant stakeholders to thoroughly investigate and address the issue. If the reported concern is found to be valid, corrective measures will be implemented, potentially including termination of the relationship.

Our Continuous Improvement Commitment

Addressing modern slavery and human trafficking represents a complex challenge for businesses. Nymph is dedicated to an ongoing, evolving, and continually improving effort to combat these practices. Our approach to preventing modern slavery and human trafficking will be consistently communicated within our business and to all suppliers, both at the beginning of our partnership and periodically throughout our relationship.

We are unwavering in our commitment to maintain and enhance our practices in the fight against modern slavery and human trafficking.

We will continue in considering and implementing the following actions:

1. Identify and evaluate additional risk areas within our business or supply chain.
2. Implement measures to reduce the risk of modern slavery and human trafficking in our business or supply chain.
3. Take necessary corrective actions as required.

4. Remain informed about any changes in the UK Modern Slavery Act, Australian Modern Slavery Act, and other relevant laws mentioned earlier, as well as related legislation.
5. Monitor potential risk areas and explore possible solutions to ensure the safety of employees, Customers, and any third parties from the threats of modern slavery and human trafficking.

Responsibility for this Statement

Our Executive Leadership holds the ultimate responsibility to ensure that everyone within our sphere of influence adheres to this statement and our associated policies. Managers at all levels are accountable for ensuring that their teams comprehend this statement and adhere to our antislavery and anti-trafficking guidelines. Nymph bears the responsibility for overseeing the principles outlined in this statement and handle any inquiries regarding the statement, assess internal control systems and procedures to ensure their efficacy in combating modern slavery and human trafficking. This statement has received approval from the Board of FORSILIUS LIMITED.

Signed by

Director of FORSILIUS LIMITED (operator of Nymph)