

Modern Slavery Act Statement

Adherence to the UK Modern Slavery Act of 2015

Fiscal Year 2022

Dispel is committed to ensuring our business, and our supply chains, are free of acts of slavery and human trafficking. The United Kingdom Modern Slavery Act of 2015 requires businesses to publish a statement specifying the efforts taken to prevent slavery and human trafficking anywhere in their own business or their supply chain for each financial year of the organization. This statement constitutes Dispel's Modern Slavery Act statement for the fiscal year ending December 31, 2022.

What is Modern Slavery?

Modern slavery encompasses all types of slavery, human trafficking, servitude and forced or compulsory labor across a vast number of industries. Modern slavery may affect individuals that are resident within or outside of the UK.

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Our Business

Dispel is an enterprise-level secure remote access platform and data streamer for industrial control systems. With Dispel, people work with their operational technology more effectively, control access for third parties and employees efficiently, and manage device access control lists—all within a secure, compliant environment.

Dispel, LLC is a Delaware corporation headquartered in Brooklyn, New York with personnel located in multiple locations including Texas and Virginia. Any reference to “Dispel” is a reference to all Dispel operations, as we uphold the values set out in this statement regardless of geographic location.

Our procurement team is based in the United States, and the suppliers supporting Dispel core products are headquartered in the United States. Our infrastructure and broader supplier ecosystem are comprised of suppliers with presences in other countries including, but not limited to, the United Kingdom, the United States, various EU countries, South Africa, Australia, and Japan.

Based on the nature of our business, which provides enterprise level software-as-a-service and infrastructure-as-a-service to other businesses and organizations, there is a low risk of slavery and human trafficking taking place. However, Dispel vehemently opposes the trafficking of persons or use of any form of slavery and has taken steps to assess and manage that risk.

If Dispel establishes that modern slavery is taking place in our business or supply chains, we will terminate the relevant relationship, report the activity to law enforcement, and co-operate with any resulting investigation.

Policies

Dispel complies with all applicable laws and regulations and is committed to preventing any form of modern slavery in our business. As such, our policies set forth our values and explain how those values impact the way we do business worldwide.

Dispel’s Code of Conduct

Dispel serves customers in many countries around the world with varying laws, regulations, and customers. Dispel’s commitment to conducting business according to the highest standards of ethical conduct applies across national boundaries. Therefore, Dispel’s global Code of Conduct prohibits involuntary labor and human trafficking. Dispel requires its employees, independent contractors, consultants, and others who do business with Dispel to comply with all applicable laws, rules, and regulations when performing work. All employees are trained upon hire and annually thereafter on Dispel’s policies.

Supplier's Code of Conduct

We operate in many countries and are subject to different laws, customs, and practices. When doing business with our suppliers and other business partners, we require they act in manners no less stringent than our own. Dispel reserves the contractual right to terminate any supplier relationship for cause if a supplier violates applicable laws. Finally, Dispel conducts regular and at least annual review of its standards for suppliers. If Dispel establishes that modern slavery is taking place in our business or supply chains, we will terminate the relevant relationship, report the activity to law enforcement, and co-operate with any resulting investigation.

Dispel's Due Diligence Actions

- Dispel analyzes and researches all suppliers prior to onboarding and sets clear expectations as to appropriate conduct using its Vendor Policy. Dispel also maps the supply chain and reviews the relevant entities to understand the nature of suppliers and the good and services that are procured and the risk any supplier may pose.
- Dispel reviews the effectiveness of its processes in ensuring that slavery and human trafficking is not taking place, by performing risk assessments to outline and assess any areas of risk in its business or supply chains. Additionally, we have established a reporting and grievance procedure ("Whistleblower Program") to ensure that where modern slavery is uncovered, it is remediated appropriately. Finally, all procurement related policies and procedures are reviewed annually to ensure an appropriate governance system is in place.

Approval of this Accessibility Statement

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act of 2015 and constitutes our modern slavery statement for the financial year ending December 31, 2022.

Approved by and signed for and on behalf of the Board of Managers of Dispel, LLC.

Name: Ethan Schmertzler

Signature: 

Title: CEO

Date: March 30, 2022