

7737 Kenamar Court
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2020 Statement for the Year Ended December 31, 2019 Slavery and Human Trafficking Statement

Introduction

IPS Group Inc, International Parking Systems (UK) Limited, IPS Europe S.R.C., IPS Group Canada U.L.C., and IPS Group Scandinavia A.B. (hereinafter, "IPS", "we", "us" or "our") are firmly committed to maintaining the highest ethical and legal standards. We continually strive to comply with both, the letter and spirit of all applicable laws and regulations. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and includes the activities of all our majority owned subsidiaries.

Our Business

Our business is primarily focused on designing and selling intelligent parking and transportation technologies to State and Local governments around the world. Our Corporate Head Office is in San Diego, California, USA, however, we have additional regional offices, including Doncaster, UK, for our wholly owned subsidiary, International Parking Systems (UK) Limited, and Pilastrello, Italy, for our Italian subsidiary.

Our Supply Chains

IPS suppliers span the globe, and therefore, we fully understand the need to ensure that all our suppliers adhere to the policy contained herein. IPS has a zero-tolerance approach to slavery and human trafficking. IPS believes in the importance of its supply chain partners to adhere to our high ethical and legal standards.

Our Policy on Slavery and Human Trafficking

At IPS, we are committed to ensuring that there is no slavery, servitude, forced or compulsory labor or human trafficking in our supply chain or in any part of our businesses.

IPS's Code of Ethics (the "Code") is a central component of our overall compliance program. Our Code is administered by our Human Resources Department and approved by our Board of Directors. It requires all employees to comply with the Code and obey the law. The Code contains policies aimed at combating slavery and human trafficking.

Proposed changes to the Code are reviewed and approved by the Board of Directors annually before being implemented and communicated to our employees. Additionally, the Board requires that all IPS employees, officers and directors review and certify their understanding and acceptance of the Code. A process to ensure annual acknowledgement and understanding of these policies is currently being developed.

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IPS's anti-bribery and anti-money laundering policies apply to all IPS officers, directors, and employees worldwide and all its subsidiaries and affiliated companies. Its general principles and prohibitions also apply to agents, distributors, consultants, and any other third parties acting on IPS's behalf, regardless of country of residence or citizenship.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk –

- Where possible, we build long-standing relationships with manufacturers, suppliers and customers, and make clear our expectations of business behavior.
- With regards to our supply chains, we expect each entity to have suitable anti-slavery and human trafficking policies and processes. We request copies of such policies for our largest suppliers and if an official policy does not exist for smaller suppliers, we request acknowledgement and certification to comply using our own policy.
- We have in place an ability for any employee to report suspected behavior to our HR Department under the protection of 'whistle blowers'.
- Failure to comply with anti-slavery laws will not be tolerated. Any IPS employee who engages in conduct that results in a violation of these laws is subject to discipline, up to and including termination of employment. Similarly, consultants, agents or third-party service providers that provide services to or on behalf of IPS should expect to have their contracts terminated if they violate anti-slavery laws.

Training

IPS has a zero-tolerance approach to slavery and human trafficking. IPS believes in the importance of its employees and business partners to adhere to our high ethical and legal standards. To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, our Anti-Slavery Policy is available in our Employee Handbook and on the Intranet.

Signed,

A handwritten signature in blue ink that reads "David W. King".

David W. King
President & CEO
IPS Group Inc.