

Policy: Modern Slavery

A **Modern Slavery** policy is essential for companies committed to ethical business practices and compliance with global laws against forced labour, human trafficking, and exploitation.

1. Purpose

This policy aims to prevent modern slavery, human trafficking, and other forms of forced labor within our operations and supply chains. The company is committed to conducting business ethically and in accordance with relevant laws, including the Modern Slavery Act 2015 (UK), the Trafficking Victims Protection Act (USA), and other global anti-slavery legislation.

2. Scope

This policy applies to all employees, suppliers, contractors, business partners, and any third parties associated with the company's operations worldwide.

3. Company Commitment

We are committed to:

- Ensuring that modern slavery, forced labour, and human trafficking do not take place in any part of our business or supply chain.
- Complying with local, national, and international laws concerning modern slavery.
- Maintaining transparency and accountability in all business dealings.

4. Definitions

- **Modern Slavery:** Encompasses slavery, servitude, forced and compulsory labor, and human trafficking.
- **Forced Labor:** Work or services performed involuntarily under threat of penalty.
- **Human Trafficking:** The recruitment, transportation, or harboring of individuals by force, coercion, or fraud for exploitative purposes.

5. Due Diligence Processes

We will undertake the following steps to prevent modern slavery:

- **Risk Assessments:** Conduct regular assessments of suppliers and partners to identify and evaluate modern slavery risks.
- **Supplier Code of Conduct:** Ensure that all suppliers sign a code of conduct prohibiting forced labor and requiring adherence to all relevant labor laws.
- **Supply Chain Audits:** Periodically audit and monitor our supply chains to identify any violations of this policy.
- **Whistleblowing Mechanisms:** Provide confidential channels for employees and suppliers to report concerns regarding modern slavery or unethical practices.

6. Training and Awareness

- **Employee Training:** Provide training to employees, particularly those in procurement, human resources, and supply chain management, on identifying and preventing modern slavery.
- **Supplier Training:** Offer guidance and training to suppliers on their obligations to uphold labor rights and prevent exploitation.

7. Reporting Violations

All employees, suppliers, and partners are required to report any concerns about modern slavery in the company's operations or supply chain. Reports can be made anonymously through the company's whistleblower hotline or directly to management.

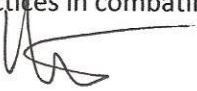
8. Non-Compliance

The company will:

- Investigate reports of non-compliance with this policy.
- Terminate relationships with suppliers, contractors, or partners found to be in violation of modern slavery laws.
- Take disciplinary action against any employee found complicit in modern slavery practices.

9. Continuous Improvement

We commit to reviewing and updating this policy regularly, ensuring it remains aligned with current laws and best practices in combating modern slavery.



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CEO

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