



## Modern Slavery Policy

### 1. What does this policy cover and who is covered

Modern slavery – commonly called ‘slavery’, ‘child labour’ and/or ‘human-trafficking’ – 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 in order to exploit them for personal or commercial gain. These are heinous activities that we will never engage in or condone as a business, and that we condemn in others who engage in them.

We have a zero-tolerance approach to modern slavery and will not engage in business of any description with any business who does so. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

If we discover that any business or individual associated in any way with our business is engaged in, or otherwise supporting, and/or condoning or failing to prevent such activities, when such activities are within their control and/or influence, we will cease all connection with them. We will also consider whether we are under any reporting or other legal duty in respect of this disassociation and our reasons for it.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Failure to comply with this policy may result in disciplinary action, including dismissal or termination of your contract with CreoPlan Ltd. It could also involve other legal steps being taken against you.

If you have any queries about this policy or any concerns about activities that are identified within it, and which may affect our business, please raise them without delay with Simon Davison, who is our designated anti-slavery officer and responsible for this policy.

### 2. It is not part of your employment contract

This policy is not part of your employment contract. We, CreoPlan Ltd, may amend this policy at any time.

### 3. Prevention of these prohibited activities

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your team leader as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur, in the future.

We also encourage you to raise concerns about any issue, or suspicion, of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your team leader.

We do not anticipate that any circumstance would arise in the operation of our business activities. However, we invest in making the appropriate checks on all employees, recruitment agencies, and suppliers to be certain who is working for, or on behalf of, us and that they are permitted to work and paid fully and fairly for what they do.

All our employees are paid fairly according to legal requirements, the arrangements for which are properly and lawfully set out in their written contracts of employment.

The health and safety of all of our employees and workers is also of paramount importance to CreoPlan Ltd and we take our legal obligations very seriously, including in relation to working hours, rest breaks, and holidays.

### 4. Reporting obligations of CreoPlan Ltd’s Employees and/or workers providing services

We expect you immediately to report to Simon Davison any reasonable grounds for believing that any of the prohibited activities listed in this policy are occurring in any of our business activities or supply chains.

Our designated person, identified above, will take any report made to them very seriously and will promptly and responsibly investigate the allegations made or suspicions shared. They will make recommendations to and agree with our senior management on the actions that should be taken following any such investigation.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure, which can be found set out in our Grievance Policy.

#### 5. Compliance obligations on CreoPlan Ltd's suppliers

We expect all of our suppliers to share a similarly uncompromising commitment to the same levels of compliance as we have set out in this policy.

As a condition of our trading relationship, any supplier to our business will be asked to confirm to our designated anti-slavery officer that they comply with all relevant legal obligations and industry best practices applicable to their business, including those relating to modern slavery. In addition to this statement of self-certification, we will also ask for specific confirmation that our suppliers do not, in any part or aspect of their business, or business relationships, engage in slavery, forced labour or servitude, child labour, or human trafficking.

We will take action to terminate existing contracts with, and to pursue appropriate legal remedies against, any suppliers who we subsequently discover to have been operating in breach of this policy.