

MODERN SLAVERY POLICY

POLICY STATEMENT

1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced or compulsory labor and human trafficking. These offences are closely related but legally distinct:

- ◆ **Slavery**

where ownership is exercised over an individual

- ◆ **Servitude**

involves the obligation to provide service imposed by coercion

- ◆ **Forced and compulsory labor**

all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty

- ◆ **Human trafficking**

involves arranging or facilitating the travel of another with a view to exploiting them.

Other forms of modern slavery and other practices, which we will not tolerate in our supply chains (whether on a domestic or international level) and in our own operations include, but are not limited to:

- ◆ **Child labour**

whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

- ◆ **Threats of violence, harassment and intimidation**

- ◆ **Discrimination**

- ◆ **The confiscation of the original identification documents of workers**

- ◆ **The use of worker-paid recruitment fees.**

All forms of modern slavery have in common the deprivation of a person's liberty by another to exploit them for commercial or personal gain.

2. The Company is committed to taking steps where reasonably practicable to ensure that modern slavery is not taking place in any part of its own business and in any of its supply chains.

3. The Company expects all its employees, officers, and directors ('members of staff') to try to ensure that they are in no way connected with modern slavery either through the commission of a criminal offence or through actions or omissions that might bring themselves and/or the Company into disrepute.
4. Although it is not practical to have a direct relationship with all links in our supply chains and although we do not have the ability to control the conduct of such individuals and organizations, the Company has the same expectations of its contractors, suppliers and other business partners as are set out in section 3 above.
5. The Company will from time to time assess and review the risk that modern slavery may be occurring in any part of its own business and in any of its supply chains. In light of any such risk assessments it may from time to time seek specific and further reassurances from its contractors, suppliers and other business partners; and seek to carry out or procure due diligence or specific audits either itself or through group companies or third parties to satisfy itself that modern slavery is not occurring.
6. Where possible we build long standing relationships with contractors, suppliers and other business partners and make clear our expectations of business behavior. This helps to reduce the risk of modern slavery.
7. The Company is committed to transparency in its approach to tackling modern slavery consistent with its disclosure obligations under section 54 of the Modern Slavery Act 2015.

APPLICATION OF THIS POLICY

8. This Policy applies to all members of staff.
9. All members of staff are expected to read, understand and, so far as reasonably possible, work with the Company to assist with the aims of this Policy. If any suspicion that modern slavery might be occurring in any part of the Company's business or in any of the Company's supply chains, all members of staff are expected to raise concerns at the earliest possible opportunity with their manager or director.
10. Persons who are not members of staff of the Company are equally encouraged to raise any concern, issue or suspicion of modern slavery in any part of our business or in any of the Company's supply chains, by contacting the Company using the following email: info@cbc-europe.com.
11. The Company wishes to encourage openness and will support anyone who raises a genuine

concern that modern slavery might be taking place in any part of the Company's business or in any of the Company's supply chains, even if that concern ultimately turns out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicions 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 any 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 member of staff, you should raise it formally by contacting the Chief Operating Officer ('COO').

RESPONSIBILITY FOR THIS POLICY

12. The Company's board of directors has overall responsibility for this Policy, including ensuring that it complies with legal and ethical obligations.
13. The COO is primarily responsible for the day-to-day implementation of this Policy including monitoring its effectiveness and ensuring that all members of staff are aware of and understand this Policy.
14. All members of staff are responsible for following this Policy to the extent that it affects their day-to-day work and particular in respect of the reporting requirements. Members of staff are invited to comment on this policy and suggest ways on which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the COO.

BREACHES OF THIS POLICY

15. This Policy is not designed to be contractual in respect of members of staff. Any breach of this Policy by any member of staff that is deemed by the Company to be wilful or negligent, including in respect of his or her responsibilities, shall be investigated. Any remedial action that ensues will be taken in accordance with the Company's disciplinary processes. If, after investigation and due process, a breach is deemed by the Company to be very serious, it could lead to sanction, up to and including summary dismissal.
16. In the event that the Company has a reasonable belief that modern slavery is occurring in the business or supply chains of any contractors, suppliers, and other business partners, the Company:

(a) will expect the relevant contractor, supplier or other business partner:

- i) to be fully cooperative and transparent and supply such information as the Company may reasonably request in relation to the issue;

- ii) to put in place remedial action as soon as reasonably practical with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded; and
- iii) to monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victims; and
- iv) to report to the Company at reasonable intervals on the effectiveness of that remedial action and safeguarding and any further steps taken to ensure that such modern slavery ceases to occur.

(b) may, depending on the circumstance and the terms of the contract with the relevant contractor, supplier or other business partner, terminate or suspend the relationship or otherwise cease, reduce or minimize business contact with the relevant contractor, supplier or other business partner.

17. In the event that the Company has a reasonable belief that modern slavery is occurring in any part of its own business or its supply chains the Company will:

- (a) as soon as reasonably practical and so far as is reasonably possible, put in place or recommend remedial action with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded;
- (b) monitor the effectiveness of the remedial action taken; and
- (c) as appropriate, deal with the matter under its disciplinary procedures (see section 15 above).

TRAINING

18. Existing members of staff have received training to assist them in being able to identify modern slavery and to understand the contents and purpose of this Policy and the Company's procedures relating to combating modern slavery. On an ongoing basis, new members of staff will receive similar training.

19. The Company expects its contractors, suppliers and other business partners to provide appropriate training to their members of staff and, if and when requested, evidence that they have done so.

AMENDMENT TO THIS POLICY

20. This Policy expresses the will of the Company and its commitment to the issues addressed. This Policy may be amended by the Company at its discretion at any time.

21. This Policy will be reviewed by the Company's board of directors on a regular basis,

usually at the same time as the board reviews the Company's annual Slavery and Human Trafficking Statement.