

## 1. PURPOSE

Sharpfibre Ltd is committed to providing a work environment that is free from human trafficking, forced labour and unlawful child labour ("human trafficking and slavery"). The Company strongly believes that it has a responsibility for promoting ethical and lawful employment practices. These practices are also required to be followed by our suppliers and subcontractors. This policy also complies with the Modern Slavery Act 2015.

## 2. SCOPE

This policy covers all employees of Sharpfibre Ltd.

## 3. DEFINITIONS

### 3.1

**Human Trafficking:** the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

### 3.2

**Forced Labour:** all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

### 3.3

**Harmful Child labour:** consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

## 4. POLICY

Sharpfibre Ltd will not tolerate the use of unlawful child labour or forced labour in the services it provides and will not accept products or services from Suppliers that employ or utilise child labour or forced labour in any manner. Human trafficking and slavery are crimes under United Kingdom and international law. These crimes exist in countries throughout the world. This Policy is to define how Sharpfibre Ltd will make efforts to eradicate human trafficking and slavery from not only within its organisation but also from its supply chains.

## 5. RESPONSIBILITIES

The Managing Director has overall responsibility to ensure the principals of this policy and the Modern Slavery Act 2015 legislation are adhered to at all times during any business activities carried out by the Company, including the procurement of any supplier relationships.

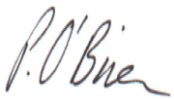
All employees of Sharpfibre Ltd have a duty to report any concerns or suspicions of human trafficking and slavery in any part of the business or its supply chain at the earliest stage possible so appropriate action can be taken. Reports can be made to the employee's line manager or directly to the Managing Director. The Company's Whistleblowing Procedure may also be used.

## 6. SUPPLIER REQUIREMENTS

The Company will require suppliers to the business to confirm the following before carrying out any business with them:

- They will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- They will ensure that the overall terms of employment are voluntary;
- They will comply with the minimum age requirements prescribed by applicable current legislation unless a specific contract contains stricter age requirements;
- They will ensure its workers are provided with wages and benefits that meet or exceed the legally required minimum;
- They will abide by the Working Time Directive with regards to working hours and rest breaks.

Any employee involved in the engagement and procurement of suppliers to the Company must communicate the principles above at the outset and throughout the business relationship. The Company may terminate any relationship with business suppliers if they do not comply with the legislation and principles above.



P O'Brien  
Managing Director  
8<sup>th</sup> January 2024

## Anti Slavery Policy (POL002)