



CluneTech.

CluneTech Policy on Anti-Slavery and Human Trafficking

Effective Date: 1st January 2025
Revision Date: 31st December 2025
Revision Number: 7

Purpose

The policy of CluneTech is to conduct all of our business in an honest and ethical manner, and to comply with all applicable legislation. We strive to ensure that neither modern slavery nor human trafficking supports our supply chain or our businesses; this objective is implicit in our policies and procedures. We aim for a zero-tolerance approach to violations of anti-slavery and human trafficking laws. If breaches of these laws are found within our supply chain, we will look to support organisations in their efforts to comply with the applicable legislation.

However, CluneTech will review the continuation of business with individuals and organisations found to be involved in slavery, human trafficking, forced or child labour and retains the right to cease business with such individuals and organisations on an ongoing basis. Clune Tech is committed to acting professionally and with integrity in all its business dealings and relationships globally.

In this context, CluneTech has created a focused Anti-Slavery and Human Trafficking Policy.

CluneTech have a Supplier of Products/Services Risk Assessment Team which evaluates and reviews suppliers & vendors that fall within industries/sectors and/or countries that carry a higher risk in respect of modern slavery & human trafficking.

HR and Compliance jointly will review this policy and its operation in practice, at least on an annual basis.

Guidelines

All employees and directors within the firm have a statutory obligation to report knowledge or suspicion of slavery or human trafficking. Any genuine suspicion or knowledge of slavery or human trafficking is to be immediately reported to your HR contact who will decide what further action, if any, is deemed necessary.

If the issue reported also relates to knowledge or suspicion of money laundering or terrorist financing then a further report is to be submitted to the Money Laundering Reporting Officer (MLRO).

Directors and employees who raise concerns of slavery or human trafficking in good faith may do so without fear of discrimination or reprisal.

These provisions do not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, these must be fully complied with.

Employment procedures

CluneTech has procedures in place pertaining to our employment practices.

Robust recruitment processes in line with jurisdictional employment law (as applicable), including "right to work" document checks, contracts of employment, and checks to ensure all employees are above minimum working age of the country concerned.

Supply chain

We recognise that our firm is exposed to a greater slavery and human trafficking risk when dealing with suppliers of products and services, particularly those who have operations and suppliers in other territories.

In this context, we have identified areas we need to develop in conjunction with our supply chain, and we have a risk-based approach and we are developing additional measures to assist in the review and management of this area of risk. As part of CluneTech's risk identification and mitigation, we carry out due diligence on all potential new suppliers. These help us assess the suitability of a vendor to provide goods and services to CluneTech. These due diligence steps are outlined in the CluneTech Anti-Money Laundering Compliance Manual.

Related policies and documents

In addition to the Anti-Slavery and Human Trafficking Policy mentioned above CluneTech has additional related policies and documents.

CluneTech has a number of further policies and documents which reflect our objective to act ethically and in line with our legal and regulatory obligations with regard to our employees, clients and our business relationships.

- CluneTech regional Employee Handbooks;
- CluneTech Anti-Money Laundering Compliance Manual; and

These policies and documents will continue to be reviewed on, at minimum, an annual basis.

Learning

We want to help our employees, directors, clients and suppliers to understand more about these issues and understand how to report any suspicions they may have related to modern slavery and human trafficking.

CluneTech continuing to incorporate anti-slavery and human trafficking issues into our New Hire and Annual trainings along with CluneTech's Anti-Slavery and Human Trafficking policy, to be delivered to our employees and directors on a periodic basis. All new starters and all employees taking refresher training will also receive Code of Conduct training that includes the following:

- conducting business in full compliance with all applicable laws and regulations, and in accordance with the highest ethical standards; and
- being willing to take a stand to correct or prevent any improper activity

■ Protected Disclosures (Whistleblowing)

We encourage our employees, customers and suppliers to report any concerns about unlawful conduct that they suspect is taking place at work. This includes any concerns regarding the risk of slavery or human trafficking. Our Policy on Protected Disclosures will apply to all individuals employed by CluneTech, including individuals, directors and Board members, shareholders, contractors, consultants, agency individual, interns/ trainees, temporary individuals, former individuals and job applicants (where information on a relevant wrongdoing is acquired during the recruitment process or during pre-contractual negotiations) of CluneTech

■ Responsibilities

All employees are responsible for keeping within the guidelines. Managers are responsible for administering this policy and for enforcing its provision.

■ Ongoing Assessment

Compliance will take a risk based approach when carrying out periodic reviews of the effectiveness of the processes outlined in this policy. We also carry out internal audits which take a risk based approach as to whether a review of these processes is deemed necessary. We will also continue to assess all other practices and engage with our stakeholders, including vendors, to raise awareness and reduce the risk of modern slavery and human trafficking occurring in our organization and supply chain.

■ Disciplinary

Any employee found to be in breach of this policy may be subject to disciplinary action up to and including dismissal.

■ Authority

The Compliance Team issue this policy pursuant to the authority provided from the Directors of the company.

■ Interpretation

The Compliance Team are responsible for official interpretation of this policy. Questions regarding the application of this policy should be directed to The Compliance Team. The Compliance Team reserve the right to revise or eliminate this policy at any time.