

Anti-Slavery and Human Trafficking Policy

1.0 INTRODUCTION

Creative Computing Solutions is committed to eliminating any form of modern slavery, such as servitude, forced or compulsory labour and human trafficking, which all have in common deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

2.0 SCOPE

Applies to all persons working for us, on our behalf in any capacity, including directors, officers, agency workers, seconded workers, volunteers, interns, contractors, external consultants, third party representatives and business partners. This policy does not form part of any employee's contract of employment.

3.0 OBJECTIVES

The purpose of this policy is to provide a clear framework and effective systems to ensure modern day slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern day slavery throughout our supply chain.

3.1 WE WILL ACHIEVE THIS BY:

- Being committed that our entire workforce or those who work on our behalf in any capacity understand and are aware of our 'zero' tolerance approach.
- Ensuring that our contractors, suppliers and other business partners comply with our specific prohibition against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.
- Ensuring that all the workforce, including directors, officers, agency workers, seconded workers, volunteers, interns, contractors, external

consultants, third party representatives and business partners, are fully aware of our Policy

3.2 IN PARTICULAR WE WILL:

- Ensure all people managers are fully aware of the contents of the Policy and apply this in their own areas.
- Ensure that all employees understand and comply with the Policy.
- Commit to ensure that the Policy is maintained, reviewed and updated regularly.
- Comply with our ethical and statutory obligations.

4.0 RESPONSIBILITIES

Managers - have the primary and day to day responsibility in ensuring this Policy is implemented in their own area. Queries on the application or interpretation of the Policy must be discussed with Human Resources before any action is taken.

Employees – are required to comply with the Policy.

Human Resources – are responsible for ensuring the maintenance, regular review and updating of the Policy.

5.0 DEFINITIONS/CRITERIA

Modern slavery is a crime and a gross violation of fundamental human rights. It may take various forms such as, enslavement of another human being(s), servitude, forced and compulsory labour and human trafficking, all of which have in common – the deprivation of a person or persons liberty by another in order to exploit them or personal or commercial gain.

6.0 PROCEDURES

6.1 The Board of Directors have overall responsibility for ensuring the Policy complies with our ethical and legal obligations.

6.2 There is a requirement to avoid any activity that might lead, or suggest a breach of this Policy. There is a requirement and obligation to notify line managers or to raise this through the Whistleblowing Policy as soon as possible, if there is a belief or suspicion that a conflict with this Policy has occurred, or may occur in the future.

6.3 Those defined in the scope above are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chain, or any supplier at the earliest possible stage.

6.4 There is a requirement and obligation to report suspicions that a breach of the Policy has occurred, or belief that a breach may occur, to the line manager or in accordance with the Whistleblowing Policy.

6.5 If there is uncertainty as to whether a breach has occurred, eg whether a particular act, treatment of workers, or working conditions, within the Creative Computing Solutions supply chain potentially constitutes any form of the various forms of slavery – this must be raised with the line manager and/or HR Representative.

6.6 It is Creative Computing Solutions's aim to encourage and support openness of anyone who raises a genuine concern in good faith under this Policy. Creative Computing Solutions is also committed to ensuring that no-one suffers detrimental treatment as a result of reporting, in good faith, the suspicion that modern slavery of whatever form is or may be taking place.

6.7 If it is believed that as a result of reporting a suspected breach of the Policy in good faith, that the person reporting such a breach has suffered detrimental treatment, which may include, dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern, this should be raised with the respective HR Representative. In the event that the matter is not remedied the person reporting the breach will have the right to raise this formally using the Grievance Procedure.

6.8 Any employee who has been found to have breached this Policy may after due process be subject to disciplinary action, which would be considered as gross misconduct and may lead to dismissal.

6.9 We may terminate our relationship with other employees, suppliers and other associates working with Creative Computing Solutions if, after due investigation the breach of this policy is proven.

6.10 We will communicate our zero-tolerance approach to Modern Day Slavery to all suppliers, contractors and business partners at the commencement of our business relationship.

6.11 Suppliers who fail to comply with our Human Trafficking and Anti-Slavery Policy, or who are unwilling to comply will not be on-boarded.