

## MODERN SLAVERY POLICY

Afinta opposes all forms of modern slavery, human trafficking, forced or compulsory labour, and child labour. This policy affirms Afinta's commitment to upholding human rights and operating responsibly, transparently, and ethically in all business activities and supply chains.

### Governance and Oversight - Afinta will...

- Uphold a zero-tolerance stance on modern slavery, with Board-level oversight
- Integrate modern slavery risk into broader risk management and compliance systems
- Review modern slavery risks through structured reporting and leadership engagement

### Legal and Ethical Standards - Afinta will...

- Comply with the UK Modern Slavery Act 2015 and relevant local laws
- Align with the UN Guiding Principles on Business and Human Rights
- Adopt best practice frameworks including ISO 20400 and ISO 26000

### Employment - Afinta will...

- Ensure all work is undertaken freely, without coercion, fees, or retention of personal documents
- Prohibit child labour and support fair, lawful employment practices
- Respect workers' rights to leave employment with reasonable notice

### Supply Chain and Procurement - Afinta will...

- Embed ethical sourcing principles in procurement policies and supplier contracts
- Require suppliers to adopt or align with Afinta's Code of Conduct
- Conduct due diligence on suppliers through screening, questionnaires, and audits
- Investigate and act on concerns, applying corrective actions or contract termination if required
- Prioritise partnerships that demonstrate continuous improvement in labour standards

### Risk Assessment and Due Diligence - Afinta will...

- Identify high-risk sectors and geographies using structured risk frameworks
- Assess new and existing suppliers for modern slavery risk during onboarding and contract renewal

- Apply escalation protocols for concerns or red flags

### **Training and Awareness - Afinta will...**

- Deliver mandatory training on modern slavery and ethical conduct to all personnel
- Provide targeted training for procurement and commercial roles
- Promote awareness and provide tools to support responsible decision-making

### **Reporting and Whistleblowing**

- Encourage reporting of concerns via confidential whistleblowing channels
- Investigate all reports impartially and without retaliation
- Uphold protection for individuals who report concerns in good faith

### **Monitoring and Continuous Improvement**

- Review this policy annually to reflect changes in law and practice
- Track performance through audits, supplier reviews, and incident reports
- Include modern slavery in internal audits and assurance reviews
- Engage with sector-wide initiatives and guidance, including the UN Global Compact

### **Communication and Transparency**

- Make this policy available to all personnel and stakeholders
- Publish an annual Modern Slavery Transparency Statement, in line with UK legal requirements

This policy supports Afinta's core values of integrity, transparency, and respect for human rights. It is reviewed regularly to ensure ongoing relevance and effectiveness.