

# Modern Slavery Policy

DOCUMENT CLASSIFICATION	Confidential
DOCUMENT REF	POL-DOC-0049
VERSION	1.2
DATED	19 <sup>th</sup> January 2026
DOCUMENT AUTHOR	Donna Birkett
DOCUMENT OWNER	ESG Environmental, Social and Governance

## Revision history

1.0	30 <sup>th</sup> January 2024	Donna Birkett	Creation of document
1.1	30 <sup>th</sup> January 2024	Donna Birkett	Reviewed and submitted for approval
1.2	19th January 2026	Rommel Argotte	Reviewed and submitted for approval

## Distribution

NAME	TITLE
Karl Gilbank	Director
Asa Moore	Head of IT and Security
Benoit Caron	COO
Claude Richard	Product Manager
Ryan Evans	Infrastructure & Systems Lead

## Approval

NAME	POSITION	SIGNATURE	DATE
Benoit Caron	COO	<i>Benoit Caron</i>	30 <sup>th</sup> January 2024
Benoit Caron	COO	<i>Benoit Caron</i>	19th January 2026

## Contents

### **1 Policy statement**

#### **1.2 Rationale**

#### **1.3 Definitions**

#### **1.4 Requirements for Suppliers:**

##### **1.5 Certification**

##### **1.6 Audits**

##### **1.7 Reporting**

### **2 Consequences**

### **3 Additional action points**

## 1 Policy statement

The Company “ETI-NET” is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively “human trafficking and slavery”). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Accordingly, ETI-NET will not knowingly use unlawful child labour or forced labour in any of the utilities and/or other commodities, products and/or services it provides, nor will it accept commodities, products and/or services from suppliers that employ or utilize child labour or forced labour.

### 1.2 Rationale

Human trafficking and slavery are crimes under international law. These crimes exist in countries throughout the world. This policy statement thus defines ETI-NET’s commitment to ensuring that human trafficking and slavery does not exist within its own business, but also provides how ETI-NET will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship (and especially from within its supply chain). All Suppliers are therefore required to adhere to the following:

### 1.3 Definitions

**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 purposes of exploitation.

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

**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.



## 1.4 Requirements for Suppliers:

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty.
- Will ensure that the overall terms of employment are voluntary.
- Will comply with the minimum age requirements prescribed by applicable laws.
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Will abide by applicable law concerning the maximum hours of daily labour.
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking which would constitute an offence.
- Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to ETI-NET, also adhere to these requirements.

## 1.5 Certification

Suppliers will certify compliance with this Policy and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.

## 1.6 Audits

Upon request, Suppliers must be able to demonstrate compliance with this Policy to the reasonable satisfaction of ETI-NET. ETI-NET may perform periodic audits on this Policy and Suppliers are expected to fully co-operate with any such audit.

## 1.7 Reporting

Any breach of this Policy (including by a Supplier) can be reported (in confidence, if required) by raising a ticket in the Service Desk Self Service Portal (in his capacity as the Company Anti- Slavery and Human Trafficking Officer).



## 2 Consequences

ETI-NET takes any breach of this Policy extremely seriously.

Suppliers who are found to have or are engaging in human trafficking and slavery or who refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with ETI-NET terminated immediately, without compensation.

If a Supplier to ETI-NET is found in violation of this policy, ETI-NET will take prompt action which may include terminating any supply agreement, arrangement, or other contract with that Supplier (as above). It shall also take such other (remedial) steps as the Anti- Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

## 3 Additional action points

In addition to producing the annual statement, ETI-NET is committed to:

- Ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility.
- Ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure.
- Conducting regular audits to ensure that all our employees are paid in accordance with applicable law and have the right to work in the relevant country.
- Assigning the Governance, Risk, and Compliance team to oversee and coordinate the resolution of issues reported through the service desk portal related to compliance with international law.
- Ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with international law. and to ensure that any of their suppliers and sub-contractors also operate in accordance with the law.
- Identifying and addressing any areas of high risk in our supply chain
- Providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.