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# Modern Slavery & Human Trafficking Policy

Theorise Ltd has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

Modern slavery is an abhorrent abuse of the human rights of vulnerable workers which can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. Identifying victims of modern slavery can be a challenge because the crime can manifest itself in different ways. It is not always clear at what point poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour.

Theorise Ltd accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications. This policy applies to all individuals working for the Company or on its behalf in any capacity, including employees, directors, agency workers, contractors, consultants and business partners.

## **Responsibilities**

The Managing Director has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations. The Business Manager has responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery and is also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

## **Compliance**

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under its control. If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify the MD immediately. If you are unsure about whether a particular act, the treatment of workers or their working conditions constitutes any form of modern slavery, please raise it with the MD or contact the government's Modern Slavery Helpline on 0800 0121 700. The Company aims to

encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its operations. Modern Slavery & Human Trafficking Policy

### **Training and communication**

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases. The Company's zero tolerance approach to modern slavery will be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

### **Breach of the policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct. The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.