



Anti-Slavery & Human Trafficking Policy

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1. Purpose of the policy

This statement sets out the steps that Connexin limited will take to ensure compliance with the modern slavery act 2015 and to show its dedication to ensuring that slavery and human trafficking is not found in its supply chain or any other part of the business. This statement has been approved by the Deputy CEO of Connexin, is publicly available on the corporate website and will be provided on request.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern 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 slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. Applicable Legislation

[Modern Slavery Act 2015](#)

3. Scope of the Policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

4. Definitions/Abbreviations

Deputy CEO – Deputy Chief Executive Officer

SHEQ – Safety, Health, Environmental and Quality

5. Responsibilities

For ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Alex Yeung, Deputy CEO is responsible for ensuring the day-to-day adherence to this policy.

The Executive Team has primary and day-to-day responsibility for implementing this policy.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The SHEQ & Compliance team are responsible for monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Employees are informed of this policy and are required to be vigilant for any signs that slavery or human trafficking is taking place. They are encouraged to report concerns about any issue or suspicion of modern slavery in any parts of the business or supply chain.

Suppliers are required to adhere to our ethical standards and ensure that their own supply chains are free from slavery and human trafficking.

6. Procedure/Description & Instructions

6.1. Compliance with the Policy

Employees must ensure that they read the policy, understand it and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or to a member of the SHEQ & Compliance team, or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or a member of the SHEQ & Compliance team.

We aim 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.

6.2 Zero Tolerance

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6.3 Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary.

7. Monitoring & Audit

This policy will be reviewed annually and updated as necessary to ensure its accuracy, effectiveness, and compliance with relevant legislation.