



## **MODERN SLAVERY POLICY** (LSAS038)

This is the modern slavery policy of ProSys International Ltd. It should be read in-conjunction with our annual modern slavery attestation.

### **1. POLICY STATEMENT**

- 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 in order to exploit them for personal or commercial gain. We are committed to acting ethically (policy LSAS 001) and with integrity (policy LSAS036) in our business dealings and relationships and are committed to preventing modern slavery in our own business and to helping prevent modern slavery in our supply chains.
- We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery. Under the Modern Slavery Act 2015 (& Modern Slavery (Amendment) Bill 2022) we are legally required to disclose the steps we take to tackle modern slavery. We expect the same high standards from all of our employees and suppliers.
- This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, managers, agency workers, consultants, suppliers, seconded workers, volunteers, and interns.
- This policy does not generally form part of ProSys' employee's contract of employment as we may amend this policy at any time.

### **2. RESPONSIBILITY FOR THIS POLICY**

- The board of directors have overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The Business Management department has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and the Regulatory Affairs department has responsibility for auditing our internal procedures.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

### **3. COMMITMENT**

To achieve our company goals we shall:

- Adhere to local and national laws
- Ensure Freedom of workers to terminate employment
- Confirm Freedom of movement
- And verify Freedom of association
- Prohibit any threat of violence, harassment and intimidation
- Prohibit the use of worker-paid recruitment fees

- Prohibit compulsory overtime
- Prohibit child labour
- Prohibit discrimination
- Prohibit confiscation of workers original identification documents
- Provide access to remedy, compensation and justice for victims of modern slavery

#### **4. COMPLIANCE WITH THIS POLICY**

- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control and/or influence. We are all required to avoid any activity that might lead to, or suggest, a breach of this policy.
- Each of us must notify your direct manager (or your main point of contact at ProSys, if you are a supplier) as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business, or supply chains, or any supplier tier, at the earliest possible stage.
- If you believe or suspect a breach of this policy has already occurred or that it may occur you must notify your manager as soon as possible.
- If you are also unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitute any of the various forms of modern slavery, you should raise it with your manager.
- 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. We are committed to ensuring no one suffers any detrimental treatment by ProSys as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure.

If it relates to a supplier, our nonconformance & corrective action process shall be instigated, with the supplier possibly being delisted.

#### **5. COMMUNICATION AND AWARENESS OF THIS POLICY**

- This policy forms part of the induction process for all individuals who work for us and will be provided otherwise as necessary.
- Periodically this policy shall be communicated with our key suppliers (tier 1 & 2).

#### **6. BREACHES OF THIS POLICY**

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organisations working for us or on our behalf (including suppliers) if they breach this policy.

This Policy shall be reviewed biannually.

Signed

A handwritten signature in cursive script, appearing to read "Dasa Dowling".

Dasa Dowling  
**Business Manager**

**Version 1 – 1<sup>st</sup> January 2024**