

## MODERN SLAVERY AND HUMAN TRAFFICKING PROTOCOL

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 person in order to exploit them for personal or commercial gain ("**Modern Slavery**").

### 1. ABOUT THIS PROTOCOL

This Modern Slavery and Human Trafficking Protocol (**the "Protocol"**) of CargoLogicManagement Ltd. (**the "Company"**) sets forth our commitment to ensure that 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.

The Protocol defines the fundamental principles and requirements for prevention of Modern Slavery and ensuring compliance with applicable legislation by the Company, its directors, officers, employees, agents, professional advisors, contractors, suppliers, vendors and other persons acting on behalf, and in the interests, of the Company. We also require 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. We further require that our suppliers will hold their own suppliers to the same high standards.

This Protocol does NOT form part of any employee's contract of employment and can be amended at any time by the Company.

### 2. FUNDAMENTAL PRINCIPLES AND REQUIREMENTS

- 2.1. The Company has a zero-tolerance approach to Modern Slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere **in the Company or in any of its supply chains**.
- 2.2. The Company operates a number of other internal protocols and policies to ensure that it is conducting its business in an ethical and transparent manner, including:

**Recruitment Protocol:** We operate a robust recruitment policy which includes checking that employees are eligible to work in the UK to safeguard against human trafficking or individuals being forced to work against their will; and

**Business Ethics & Whistleblowing Policies:** These policies advise on the whistleblowing mechanism so that all employees know that they can raise concerns about how colleagues are being treated, or about practices within our business or supply chain, without fear of reprisals.

### 3. RESPONSIBILITY FOR THE PROTOCOL

- 3.1. The Legal Department has overall responsibility for ensuring this Protocol complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2. The Regulatory and Compliance Counsel has primary and day-to-day responsibility for implementing this Protocol, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal controls and procedures to ensure they are effective in countering Modern Slavery.
- 3.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Protocol and are given adequate and regular training on it and the issue of Modern Slavery in supply chains.

- 3.4. You are invited to comment on this Protocol and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Regulatory & Compliance Counsel.

#### **4. COMPLIANCE WITH THE PROTOCOL**

- 4.1. You must ensure that you read, understand and comply with this Protocol.
- 4.2. 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. You must avoid any activity that might lead to, or suggest, a breach of this Protocol.
- 4.3. You must notify in writing your manager or the Regulatory & Compliance Counsel as soon as possible if you believe or suspect that a conflict with this Protocol has occurred, or may occur in the future.
- 4.4. You are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.5. If you believe or suspect a breach of this Protocol has occurred or that it may occur you must notify your manager or report it in accordance with our the whistleblowing procedures set out in the Business Ethics and Whistleblowing Policies as soon as possible.
- 4.6. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any level of our supply chains constitutes any of the various forms of Modern Slavery, you must raise it with your manager or the Regulatory & Compliance Counsel.
- 4.7. The Company encourages openness and will support and protect anyone who makes a disclosure which in their reasonable belief is made in the public interest and tends to show an illegality (please refer to the Whistleblowing Policy for more details), even if they turn out to be mistaken. Consistent with the Business Ethics and Whistleblowing Policies, we are committed to ensuring no one suffers any Detrimental Treatment (dismissal, disciplinary action, threats or other unfavourable treatment) as a result of making a disclosure 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. If you believe that you have suffered any Detrimental Treatment, you should inform the Regulatory & Compliance Counsel immediately. If the matter is not remedied, and you are an employee, you should raise a grievance formally with the Human Resources Department in accordance with the Grievance Protocol.

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

- 5.1. Training on this Protocol, 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 (in person or on-line) will be provided as necessary.
- 5.2. Our zero-tolerance approach to Modern Slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate thereafter.

#### **6. BREACHES OF THIS PROTOCOL**

- 6.1. Any employee who breaches this Protocol will face disciplinary action, which could result in summary dismissal for gross misconduct.
- 6.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Protocol.

Managing Director

**T.V.Arslanova**

