

Anti-slavery and human trafficking policy: suppliers

Updated October 2024

1. Policy statement

- 1.1 Modern slavery – commonly called ‘slavery’, ‘child labour’ and/or ‘human-trafficking’ – 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. These are heinous activities that we will never engage in or condone as a business, and that we condemn in others who engage in them.
- 1.2 We have a zero-tolerance approach to modern slavery and will not engage in business of any description with any business who does so. 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.
- 1.3 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.
- 1.4 If we discover that any business or individual associated in any way with our business is engaged in, or otherwise supporting, and/or condoning or failing to prevent such activities, when such activities are within their control and/or influence, we will cease all connection with them. We will also consider whether we are under any reporting or other legal duty in respect of this disassociation and our reasons for it.

2. About this policy

- 2.1 The purpose of this policy is to:
 - (a) set out the responsibilities of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
 - (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.
- 2.2 This policy applies to all suppliers and contractors working for us or on our behalf in any capacity.

3. Responsibility for the policy

- 3.1 The CEO, CFO and General Counsel have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 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.

4. Your responsibilities and how to raise a concern

- 4.1 You must ensure that you read, understand and comply with this policy.
- 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 are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 You must notify legal@expanamarkets.com as soon as possible if you believe or suspect that a breach of this policy 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 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 legal@expanamarkets.com.

4.6 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 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.

5. Communication

5.1 Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

6. Compliance obligations by our suppliers

6.1 We expect all of our suppliers to share a similarly uncompromising commitment to the same levels of compliance as we have set out in this policy.

6.2 As a condition of our trading relationship, any supplier to our business will be asked to confirm to our designated anti-slavery officer that they comply with all relevant legal obligations and industry best practices applicable to their business (including but not limited to those relating to modern slavery).

6.3 In addition to this statement of self-certification, we will also ask for specific confirmation that our suppliers comply with the terms of the Modern Slavery Act and certify that they do not, in any part or aspect of their business, or business relationships, engage in slavery, forced labour or servitude, child labour, or human trafficking.

7. Specific requirements imposed on our suppliers

7.1 In performing their obligations to the Expana Group, all suppliers shall (and shall procure that their subcontractors shall):

- (a) comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force (“**Anti-slavery Laws**”) including but not limited to the Modern Slavery Act 2015;
- (b) comply with this Anti-Slavery Policy;
- (c) not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct had been carried out in England or Wales;
- (d) include in their contracts with subcontractors anti-slavery and human trafficking provisions that are at least as onerous as those set out in this clause;
- (e) notify us in writing as soon as they become aware of any breach or suspected breach of this policy;
- (f) respond promptly, truthfully and honestly to any due diligence questionnaire (including any slavery and human trafficking questionnaire);
- (g) implement due diligence procedures for their sub-subcontractors or any part of their supply chain performing obligations under this agreement to ensure that there is no slavery or human trafficking taking place;
- (h) maintain a complete set of records to trace the supply chain of all goods and services provided to Expana;
- (i) implement a system of training for their employees, and sub-subcontractors to ensure compliance with this policy and Anti-slavery Laws; and
- (j) keep a record of all training offered and completed by their employees, and sub-subcontractors to ensure compliance with this Anti-Slavery Policy and Anti-slavery Laws and shall make a copy of the record available to Expana on request.

8. Audit

8.1 We reserve the right to audit the practices of our suppliers to ascertain their compliance with this policy at any time on reasonable notice.

9. Breaches of this policy

9.1 We will take action to terminate existing contracts with, and to pursue appropriate legal remedies against, any suppliers who we subsequently discover to have been operating in breach of this policy.

9.2 Breach of this policy by a supplier shall be deemed to be a material breach of the contract between Expana and the relevant supplier, which is irredeemable.