

1 Policy Statement

The purpose of this Anti-Slavery and Human Trafficking Policy is to affirm Charter Tech's commitment to preventing slavery, forced labour, and human trafficking in all areas of our operations and supply chain. We are dedicated to promoting ethical practices, respecting human rights, and complying with applicable laws such as the Modern Slavery Act 2015 (UK) and other relevant international standards.

Charter Tech has zero tolerance for slavery, forced labour, and human trafficking. We are committed to acting ethically, responsibly, and with integrity in all business relationships. We will implement and enforce systems and controls to ensure that modern slavery is not taking place anywhere in our business operations or supply chains.

2 Scope

This policy applies to all Employees, Managers, Directors, Contractors, Consultants, and other Third-Party representatives acting on behalf of Charter Tech, including Vendors, Suppliers, and other Business Partners. Compliance with this policy is mandatory.

3 Definitions

Slavery: The condition in which individuals are owned or controlled by others, deprived of their freedom, and forced to work against their will.

Human Trafficking: The recruitment, transportation, transfer, or receipt of individuals through force, fraud, or coercion for the purpose of exploitation.

Forced Labour: Work or services extracted from an individual under threat or penalty, and for which the person has not volunteered.

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4 Responsibilities

- a) Management
 - Ensure awareness of, and compliance with, this policy across the organisation.
 - Allocate resources for due diligence, monitoring, and risk assessments related to slavery and human trafficking.
 - Provide training and resources to staff, particularly those involved in supply chain management.
- b) Employees
 - Abide by this policy and report any concerns or suspected cases of modern slavery or trafficking.
 - Remain vigilant and attentive to signs of forced labour or unethical labour practices within the company and among suppliers or partners.
- c) Suppliers and Business Partners
 - Share our commitment to ethical labour practices and abide by all applicable laws.
 - Undergo due diligence assessments, when required, to confirm compliance with our anti-slavery standards.

5 Due Diligence and Risk Assessment

Charter Tech is committed to conducting due diligence on our operations and supply chains to identify, assess, and mitigate risks related to slavery and human trafficking. Our approach includes:

- **Supplier Audits:** Where deemed necessary by management, there will be regular audits and assessments of suppliers to ensure compliance with our standards, especially in regions where modern slavery risks are higher.
- **Risk Assessments:** Where deemed necessary by management, there will be periodic assessments of supply chains, including mapping of high-risk areas or industries, to understand and address potential vulnerabilities.
- **Supplier Agreements:** Where deemed necessary by management, there will be inclusion of anti-slavery provisions in supplier and partner contracts, reinforcing our commitment to ethical labour practices.

6 Reporting and Investigation

Reporting: Any employee or third party aware of or suspecting a violation of this policy is encouraged to report it to their line manager, Head of Administration, or to the Managing Director.

Investigation: All reported concerns will be promptly and thoroughly investigated. Confidentiality will be maintained to the fullest extent possible, and retaliation against whistleblowers is strictly prohibited.

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7 Remediation and Corrective Actions

In cases where modern slavery or human trafficking is identified, Charter Tech will take swift and appropriate corrective action. This may include:

- Termination of contracts with suppliers or partners found to be in violation of anti-slavery practices.
- Engaging with affected parties to provide support and remediation.
- Collaborating with relevant authorities or NGOs to address the situation.

8 Training and Awareness

Where deemed necessary, Charter Tech will provide training to employees and representatives to ensure understanding and compliance with this policy.

9 Policy Review

- This policy will be reviewed annually or in response to changes in legislation or organisational needs.
- Updates will be communicated to all employees.



D A BENHAM

MANAGING DIRECTOR

06-Nov-2024



B ELLIOT

HEAD OF ADMINISTRATION

06-Nov-2024

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