

Calnex Solutions plc

Modern Slavery and Human Trafficking Policy

1. Introduction

The Calnex Board is responsible for establishing this Modern Slavery and Human Trafficking Policy (the “Policy”) for Calnex Solutions plc and its subsidiaries worldwide (together “Calnex” or the “Company”).

This Policy will be communicated to all employees of Calnex, as well as business partners and other necessary individuals and entities. It applies to all Calnex employees, permanent and temporary, officers, consultants, contractors, casual workers and agency workers (collectively referred to as “Calnex personnel” in this policy) and, to the extent relevant, to any business partners acting as agents or associates or in any similar capacity on behalf of Calnex. It extends to our businesses and transactions in all countries in which we and our business partners operate.

It is the responsibility of each Calnex employee to familiarise themselves with this Policy and ensure compliance with its terms. This Policy does not form part of any employee’s contract of employment and Calnex may amend it at any time.

2. 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. Calnex 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 its business or in any of its supply chains.

Calnex is also committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its contractors, suppliers and other business partners, and as part of our contracting processes, it includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and it expects that its suppliers will hold their own suppliers to the same high standards.

3. Responsibility For This Policy

The Calnex Board has overall responsibility for this policy. The Company’s CFO has primary and day-to-day responsibility for implementing this policy, 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.

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.

If employees have any doubts as to whether their conduct is permissible, they must make contact with their relevant manager who in turn should ensure that the CFO is fully aware of any guidance given.

4. Compliance

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

A member of Calnex personnel must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Calnex personnel 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.

If any member of Calnex personnel believes or suspects a breach of this policy has occurred or that it may occur they must report it in accordance with our Whistleblowing Policy as soon as possible. It should be noted that where appropriate, and with the welfare and safety of local workers as a priority, The Company may give support and guidance to its suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If any member of Calnex personnel is 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, they should raise it their manager.

The Company aims 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 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 any member of Calnex personnel believes that they have suffered any such treatment, they should inform the CFO and HR (if an employee) immediately.

5. Communication And Awareness Of This Policy

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

Our commitment to addressing the issue of 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 thereafter.

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.

The Company may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

Last updated 5th October 2020