

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. POLICY STATEMENT

- 1.1. 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 (“modern slavery”), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2. Fitzrovian Capital (the “Company”) has a zero-tolerance approach to modern slavery within its business and supply chains.
- 1.3. This policy applies to all persons:
 - a) working for the Company, or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and agents (“Group Staff”); and
 - b) our contractors, external consultants, agencies, third-party representatives, and business partners (“Suppliers”).
- 1.4. The Company is committed to:
 - a) acting ethically and with integrity in all our business dealings and relationships;
 - b) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and
 - c) ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 1.5. We expect the same high standards from all of our Suppliers. As part of our contracting process, we include specific prohibitions against modern slavery, and we expect that our Suppliers will hold their own suppliers to the same high standards.

2. IDENTIFYING MODERN SLAVERY

- 2.1. Modern slavery may be found in:
 - a) our business for example, cleaning staff;
 - b) our supply chains; and
 - c) outsourced activities, particularly to jurisdictions that may not have adequate modern slavery safeguards.
- 2.2. There is no typical victim of modern slavery, and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking:
 - a) The person is not in possession of their own passport, identification or travel



documents;

- b) The person is acting as though they are being instructed or coached by someone else;
 - c) The person allows others to speak for them when spoken to directly;
 - d) The person is dropped off and collected from work;
 - e) The person is withdrawn or appears frightened;
 - f) The person does not seem to be able to contact friends or family freely; and
 - g) The person has limited social interaction or contact with people outside of their immediate environment.
- 2.3. The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

3. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE

- 3.1. The Management Board has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations.
- 3.2. The Management Board has primary and responsibility for implementing this policy and dealing with any queries about it.
- 3.3. All Company Staff members must comply with this policy.
- 3.4. All Suppliers must comply with this policy.

4. REPORTING MODERN SLAVERY.

- 4.1. Company Staff and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:
 - a) If you are a member of Company Staff, your Line Manager; or
 - b) If you are a Supplier, your primary account manager or business contact with the Company.

5. PUBLICATION OF THIS POLICY

- 5.1. This policy, and a training note on the issue of modern slavery, is available to Company Staff.
- 5.2. This policy is available to Suppliers on the Company's website.

6. BREACHES OF THIS POLICY

- 6.1. Any Company Staff member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2. The relevant member of the Company may terminate its relationship with a Supplier if it is in breach this policy. Alternatively, the relevant member of the Company may elect to work with the Supplier to resolve such issues.



7. POLICY REVIEW

- 7.1. The Managing Director is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice.
- 7.2. This policy does not form part of any contract of employment and may be amended at any time.
- 7.3. Company Staff members are invited to comment on this policy and suggest ways in which it might be improved by emailing feedback to the DParker@Fitzroviaan.Africa

