

Anti-Slavery and Human Trafficking Policy

1. 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. Our company endorses and complies with anti-slavery and human trafficking laws and regulations including the UK Modern Slavery Act 2015; the United States' Trafficking Victims Protection Act (TVPA) (2000, amended in 2003, 2005, 2008, 2013, 2017); Illinois' Human Trafficking & Forced Labor (720 ILCS 5/10-9), the EU Directive 2011/36/EU on Preventing & Combating Trafficking in Human Beings; Puerto Rico's Human Trafficking Law (Law 246-2011); Switzerland's Corporate Due Diligence Law (2022); and Singapore's Prevention of Human Trafficking Act (PHTA) (2015).

We are committed to acting ethically, transparently, and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We expect the same high standards from all our contractors, suppliers and other business partners.

2. About this policy

2.1 The purpose of this policy is to:

- (a) set out our responsibilities, and 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 persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2.3 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. Responsibility for the policy

- 3.1 The Chief Compliance Officer has 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 The Chief Compliance Officer 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.
- 3.3 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.
- 3.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Chief Compliance Officer.

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 the Chief Compliance Officer 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 the supply chains of any supplier tier at the earliest possible stage.
- 4.5 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.
- 4.6 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Compliance Officer immediately.

If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure, which can be found in your Employee Handbook.

5. Training and communication

5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided, as necessary.

5.2 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 on an ongoing basis.

6. Breaches of this policy

6.1 Any employee who breaches this policy will face disciplinary action under the Disciplinary Policy in the employee handbook, which could result in dismissal for misconduct or gross misconduct.

6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

SCB's Anti-Slavery and Human Trafficking Policy has been approved on behalf of the SCB Group:

Signature 

Name *Bethanie Castelnuovo*

Title *Chief Compliance Officer*

Date *09/04/2025*