

communisis

AN OSG COMPANY

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

APPROACH

Article 4 of the European Convention on Human Rights states that No one shall be held in slavery or servitude and No one shall be required to perform forced or compulsory labour. The Modern Slavery Act 2015 (the Act) creates offences relating to holding another person in slavery or servitude and human trafficking (which relates to where a person arranges or facilitates the travel of another person with a view to the transported person being exploited).

Communis Ltd and all of its subsidiaries (Communis) seeks to ensure that these principles are pursued across its entire range of business activities and that its suppliers commit to the same level of ethical standards.

Communis is committed to conducting business responsibly. We also seek to ensure that our supply chains operate to those same high standards, including those in relation to employment practices, workplace conditions and, more specifically, the prevention of forced, bonded and trafficked labour. This is upheld through the company's policies and processes and is supported by the Executive Board.

Communis will not tolerate the use of slavery, slave labour or servitude in the manufacture of products it sells and will not accept products or services from Suppliers that utilise or condone any such practices in any form. The offences created by the Act, (or similar Modern Slavery and Human Trafficking or equivalent offences), exist in countries throughout the world. This policy sets out how Communis will make efforts to eradicate human trafficking and slavery from not only within its organisation but also from its supply chains.

Communis shall and its Suppliers will be required to confirm that they comply with the Act including all of the requirements set out above, by agreeing to be bound by Communis' Modern Slavery & Human Trafficking Code of Conduct (MSHT Code). This will include their commitment to take appropriate steps to ensure that any materials incorporated into the products they provide have been sourced from suppliers who themselves comply with the laws regarding human trafficking and slavery within the country or countries in which they operate.

SCOPE

This policy covers all Communis employees, workers, contractors and agents and also the activities of its Suppliers. It also applies to any prospective joint ventures and corporate merger and acquisition activity. In the event anything within this policy conflicts with local law, local law will control the interpretation and application of this policy.

OBJECTIVES

Communis strongly believes that it is responsible for promoting ethical and lawful employment practices and is committed to a work environment that is free from slavery, servitude and human trafficking. It also requires its suppliers, subcontractors and business partners (together "Suppliers") to follow such practices worldwide.

Communis and its Suppliers shall:

- Not use forced or compulsory labour (i.e. work or service that a worker provides involuntarily, or under threat of penalty, including forced overtime where such has not been approved by collective bargaining).
- Ensure that the terms of employment or work are voluntary and freely entered into by the worker, and that personal documents such as passports are not withheld.
- Ensure that workers are not charged a fee in association with their recruitment and that they are not required to lodge security payments or deposits.
- Comply as a minimum with age requirements prescribed by applicable laws.
- Remunerate its workers with wages and benefits that meet or exceed the legally required minimum.
- Abide by any applicable law concerning maximum hours of work.

ACCOUNTABILITY & RESPONSIBILITY

The **Executive Leadership Team** is ultimately responsible for putting in place systems for the promotion of ethical and lawful employment practices internally and throughout the Communisis supply chain.

The **Procurement Team** is responsible for ensuring that procurement practices fully support business requirements with the insistence on high standards of business integrity from our suppliers. They will also ensure that Approved Modern Slavery and Human Trafficking Suppliers adhere to Communisis' MSHT Code; this covers matters ranging from corporate and social responsibility to business ethics and labour practices. A reasonable opportunity will be afforded to Suppliers to ensure that any breaches of Communisis' MSHT Code which they could not reasonably have known about upon diligent investigation are rectified. If Suppliers unreasonably refuse Communisis the facilities to undertake an audit, fail an audit or are found to have engaged in human trafficking and/or slavery they may have their supply agreements terminated on the grounds they have breached that supply agreement.

The **Communis Risk Team** will supported by the Procurement team maintain oversight of business compliance to this policy, and to support any required instances of non compliance.

All **employees** are required to adhere to the requirements of this policy and exhibit high standards of business integrity avoiding any conduct which may be brought into question. All instances of non-compliance must be reported to the relevant business area and escalated to the Executive Board if deemed necessary.

Communis' compliance with this policy shall be monitored through Internal Audit. Suppliers must be able to demonstrate compliance with Communisis' MSHT Code at the request and to the satisfaction of Communisis, who shall upon reasonable notice, be entitled to undertake periodic audits to ensure compliance with this Policy.

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