
Group Policy - Anti-slavery and human trafficking

Approved by Board on 24 November 2022

1. Introduction and purpose

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced / 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.

The Pebble Group plc (the “**Group**”) is committed to acting ethically and responsibly in all our business dealings and relationships wherever we work in the world. We aim to engage with our stakeholders to manage the social, environmental and ethical impact of our activities in the different markets in which we operate. We take a zero-tolerance approach to slavery and human trafficking.

The risks are legal, financial and reputational and can seriously compromise our Group’s businesses.

The purpose of this Policy is to support our employees and set a culture whereby decisions are made in line with our stated position and applicable law and regulation. It outlines our Group’s commitments and set out the responsibilities of our businesses in observing and upholding our position on slavery and human trafficking.

References to the “**Nominated Officer**” are to the Group General Counsel and Company Secretary.

2. Our Responsibilities – who must comply with this Policy?

The Group Chief Executive Officer (“**CEO**”) has primary responsibility for establishing and maintaining proportionate and effective anti-slavery and human trafficking compliance policies and processes within the Group. Ultimately the Pebble Group Board of directors has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Then it is the responsibility of the Divisional Lead of each Group business and their leadership teams, to ensure the effective implementation and operation of the details outlined in this Policy by their respective businesses.

Management at all levels are responsible for supporting slavery and human trafficking prevention in the workplace and ensuring those reporting to them understand and comply with this Policy and are given adequate training on it and the issue of modern slavery in supply chains, as applicable to them in their role

All directors, officers and employees at all levels, as well as other personnel who have the status of employees of the Group and its subsidiaries (collectively “**Group Employees**”) have to follow the requirements of this Policy so far as they are relevant to their role and their duties . This extends to all our business dealings and transactions in all countries in which we operate.

In addition, we seek to work with business partners and others who share our zero-tolerance approach to slavery and human trafficking and we expect them to behave consistently with the provisions in this Policy.

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This Policy is directly applicable to each Group business. It is the responsibility of each Divisional Lead to either incorporate it directly as one of their own working documents or ensure that their business has its own equivalent policy and procedures on anti-slavery and human trafficking in place. Such policies and procedures must be adapted to the businesses' own needs and the requirements of applicable local laws and regulations. However, they must also be consistent with, and a more detailed continuation of, the principles and provisions of this Policy.

3. Questions on this Policy - who to go to for advice and guidance?

If you have questions or concerns regarding any aspect of this Policy or wish to seek guidance on its interpretation and application in a specific situation, you should raise and discuss this with your direct line manager, any member of the senior management team, your local HR team or alternatively the Nominated Officer.

4. How to raise concerns and seek guidance

If you have a suspicion of, or are concerned about, possible modern slavery or human trafficking activity in connection with any part of our businesses or our supply chain, or if you believe or suspect that a breach of this Policy has occurred or may occur (involving other employees or any third party), it is your duty to speak up and you must immediately notify your manager, a member of the senior management team, or your HR team, who must in turn notify the Nominated Officer.

Alternatively, you can report it through our Group Whistleblowing Portal: <https://thepebblegroup.integrityline.com/>. Employees will receive the Group's full support when raising any such concerns.

Managers have a responsibility to encourage staff to speak freely and report any suspicion of inappropriate, unethical or illegal behaviour by another Group Employee or anyone else connected with our businesses.

5. Our commitments to anti-slavery and human trafficking:

- To act ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in our own businesses or in any of our businesses' supply chains.
- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains, we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- All staff are required 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.

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- We are committed to ensuring that no one suffers any detrimental treatment, such as dismissal, disciplinary action, threats or other unfavourable treatment as a result of reporting in good faith their suspicion that modern slavery in whatever form is or may be taking place in any part of our business or our supply chain.

6. Mandatory Contractual Clauses

Our material contracts with service providers/partners and suppliers must contain appropriate contractual clauses to offer protection and enforce good practice and procedures around anti-slavery and human trafficking. You must aim to add to all relevant templates and aim to add to any third party contracts you are asked to sign, where possible and applicable. A copy of the relevant mandatory clause is available from Group Legal, who you can engage to assist with this.

7. Communication and awareness of this Policy

The HR team within each Group business will be responsible for ensuring the communication of this Policy (or their business' equivalent policy and procedures) and that training on it (and the risk our business faces from modern slavery in its supply chains) forms part of the induction process for all relevant Group Employees, and regular training is provided thereafter, as necessary. Attendance at training is compulsory.

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.

8. Consequences of Policy violation

As the Group's businesses operate in many countries, each of which has its unique business, legal and regulatory environment, this Policy does not define a uniform set of sanctions for failure to comply with its requirements. Any violation or potential violation of this Policy will be handled by your local HR team in accordance with the applicable policies governing employee relations and disciplinary measures.

However, any such case will be taken very seriously and the Group will not hesitate to take appropriate disciplinary action, which could result in dismissal for gross misconduct. In the most serious cases, the Group will consider reporting the matter to the relevant authorities, as appropriate.

In addition, agents, contractors, business partners and other third parties who work with us or on our behalf and who breach this Policy and/or the relevant compliance clause in their agreement with us, may have their contract terminated with immediate effect.

9. Compliance monitoring and review

The applicable Divisional Lead or the CEO, as appropriate, will report any purported or potential breach of this Policy to the Group Executive Committee. The CEO will report all serious or continued non-compliance with this Policy to the Group Audit Committee and/or ultimately the Group Board for its awareness and monitoring on an ongoing basis.

The CEO in conjunction with the Nominated Officer will be responsible for ensuring the suitability, adequacy and effectiveness of this Policy and for making improvements, as appropriate. It will be reviewed and updated where necessary on at least an annual basis.

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