Modern Slavery, Human Trafficking, Child and Forced Labor Policy

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015 AND SIMILAR ACTS

OUR BUSINESS

Cennox is a multi-skilled solutions business. We work across diverse industries, from banking to transport, retail to airports, supporting the world's leading brands to deliver their services & transform their business.

Our key deliverables include the supply, installation and ongoing maintenance of technical multi-vendor and Cennox manufactured self-service hardware. We provide a suite of intelligent & physical security solutions protecting assets and infrastructure. We are a turnkey organisation transforming businesses through end-to-end property refresh projects, supported with our full portfolio of bespoke sign making & branding services.

Employing over 1500 staff worldwide, Cennox have three main Headquarters to support their regions, these are located in:

- Global Headquarters: USA - 1015 Windward Ridge Parkway Alpharetta, GA 30005
- UK - Cennox, Admiralty Way, Camberley, Surrey, UK
- EU - Cennox, Radiatorenstraat 41, B-1800 Vilvoorde, Belgium

There are numerous offices within each region. All Group activities emanate from the USA office.

OUR SUPPLY CHAIN

Our supply chains include providers of global OEM hardware & associated parts, peripheral administrative, transport and warehouse suppliers and strategic sub-contractors supporting our delivery of services. Cennox works to communicate our Anti-Slavery & Human Trafficking policy to our supply chain each year. This includes our expectation on our supply chain to understand and agree to our ethical operating policies around this important global requirement.

We have in place a supply chain compliance programme that is maintained by the relevant managers of HR, Legal & Compliance, Finance, Service and Projects. This consists of client reviews; audit; and self-certification declarations.

OUR POLICY ON SLAVERY & HUMAN TRAFFICKING

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the country of employment and checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Equality, Diversity and Inclusion policy. We are committed to providing fair opportunities in employment and to avoiding unlawful discrimination in employment. Our range of controls include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities. Cennox complies with all applicable local laws regarding equal employment.

COMMITMENTS

Cennox strictly prohibits modern slavery, human tracking or forced labor of any kind, both internally and in its supply chain. Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights. We adopt a zero-tolerance approach to modern slavery in our organization and our supply chain. The prevention, detection and reporting of modern slavery in any part of our organization or supply chain is the responsibility of all those working for us and 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. We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

Our policy includes not employing persons below the legal working age, prohibiting corporal punishment and the threat of corporal punishment of any kind, prohibiting requirements for worker deposits or similar mechanisms that restrict the right of an employee to freely terminate employment, providing fair compensation to employees that satisfy applicable local law, restricting daily and weekly working hours to applicable legal limits, and respecting employee's rights to freedom of association and collective bargaining consistent with applicable law.

Cennox expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- Adopt a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- 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. Current employees should contact their Manager, HR or our legal department should they need to report a breach.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risked based approach, we will also assess the merits of writing

to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

- Consistent with our risk-based approach we may require:
  - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action.

TRAINING & COMMUNICATION

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, in our supply chains and in our business partners, we provide relevant training to our staff.

In addition, our policy on Anti-Slavery & Human Trafficking is communicated to staff through their personal Employee Handbook, made available through our website and displayed at our offices in or close to the main areas of staff congregation. We welcome feedback and the support of our staff to share with us any and all circumstances of modern slavery, human trafficking or forced labour of any kind of which they are aware.

All suspected incidents of violation of this policy must be reported to compliance@cennox.com, legal@cennox.com and your supervisor.

OUR PERFORMANCE INDICATORS

We will assess the effectiveness of our measures to prevent modern slavery, human trafficking, and/or forced labour of any kind within our business or supply chain through the following indicators:

- Absence of Reports: No reports are received from employees, the public, or law enforcement agencies to indicate that these prohibited practices have been identified.
- Awareness: All employees and supply chains are aware of their responsibilities and obligations in regard to these prohibited practices.

REVIEWS & POLICY UPDATES

Reviews will be conducted when there are significant changes in legislation or risk profile**, but no less than biannually.**

APPROVAL FOR THIS STATEMENT

This statement was approved by the Cennox senior leadership and signed on its behalf by:

Michael Goggans
Chief Legal Officer
Cennox

19 May 2025

Copyright © Cennox - All Rights Reserved
Internal Use Only

Document Name:	Modern Slavery Policy	**Creation/Revision date:**	19/May/2025
Document Reference:	PS 3301	**Created/Revised by:**	Michael Goggans, Chris Cockett, Clair Watts
Version Number:	5	**Review due:**	19/May/2027
Owner:	Chief Legal Officer	**No. of pages:**	4

Unless expressly stated otherwise, policies and procedures do not form part of your contract of employment and may be amended from time to time.