



Modern Slavery Policy

Our Modern Slavery Policy outlines the steps that Ephuss Limited is taking under Section 54 of the Modern Slavery Act 2015 (“Act”) to reasonably ensure that modern slavery is not occurring within our business and supply chains.

Our business

Rulevolution is a trading name of Ephuss Limited, which is a company incorporated in the United Kingdom, supplying IT consultancy and IT outsourcing services.

How we define Modern Slavery

Any form of slavery, forced labour, servitude, and human trafficking are types of ‘Modern Slavery’ – criminal activity that deprives victims of their liberty and usually involves financial and other exploitation.

Our commitment

- We conduct our business fairly, ethically and with respect to fundamental human rights.
- We are committed to the prevention of all forms of Modern Slavery, both within our business and in our supply chains. We have a zero tolerance approach.

As a Employee, Contractor, Supplier or any Worker

- You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider.
- Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also lead to other legal steps being taken.

Preventing Modern Slavery in our business

- We carry out appropriate checks on all employees, contractors, recruitment agencies and suppliers, so that we know who is working for us, or on our behalf.
- We give every employee and contractor a written contract, and ensure they are paid in accordance with the law, and at a fair market rate.
- We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

Our Supply Chain

We aim to establish a relationship of trust and integrity with all our suppliers, which are built upon mutually beneficial factors.

Our supplier selection, on-boarding, and regular review procedures contains due diligence of the supplier, which includes:

- Assessing risks in the provision of particular services and supplier location.

- Auditing their health and safety standards, labour relations and employee/worker contracts.
- Review of their Modern Slavery policies, practices, procedures and history.
- The risk profile of individual countries based on the Global Slavery Index and presence of vulnerable demographic groups.

We require all suppliers to:

- Not use any form of forced, compulsory or slave labour.
- Ensure employees work voluntarily and are entitled to leave work.
- Provide each Worker with a contract that contains a reasonable notice period for terminating their employment.
- Not require employees to post a deposit/bond or surrender passports/work permits.
- Not withhold employee salaries for any reasons.
- Comply with relevant employment law and working conditions.
- Pay a fair market rate.

Controls

We operate the following for identifying and preventing slavery and human trafficking in our operations and supply chain dealings:

- Whistleblowing – we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation, to our CEO, confidentiality will be maintained (whether proven or not) to protect the identity of whistleblowers.
- Code of Conduct – we encourage employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating within the UK or abroad and managing our supply chain.
- Training – we require all managers to attend training in Modern Slavery, identification, prevention and reporting.

Approval

This Modern Slavery Policy has been approved by our board of directors, who review and update it annually.

May 2024