

Modern Slavery and Human Trafficking Policy

Introduction

- 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. Princebuild Ltd (we) has a zero tolerance approach to modern slavery and we are committed to acting ethically 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 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 expect the same high standards from all of our consultants, suppliers and sub-contractors (together 'Suppliers'). And as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our Suppliers will hold their own Suppliers to the same high standards.
- This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, sub-contractors, agency workers, external consultants, volunteers and third party representatives.
- This policy is fluid and can be amended at any time to comply with new legislation or law.

Responsibility for the Policy

- At Board level, Jonathan Pudney (Director) shall be responsible for overseeing and implementing the Policy, Jonathan Pudney will also amend as necessary, sign and publish the company's annual Modern Slavery statement.
- Management at all levels are responsible for ensuring their own personal understanding and implementation of the Policy and also to ensure that those who report to them understand and abide by the Policy.

Employee Compliance with the Policy

- You must ensure that you read, understand and comply with this policy.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chain 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.
- You must notify Jonathan Pudney as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chain at the earliest possible convenience.
- If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes a breach in legislation then you should raise it with your immediate manager or with Jonathan Pudney.
- 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 ensure that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery in whatever form is or may be taking place in

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any part of our business or in our supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or any other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Department immediately. If the matter is not remedied to your satisfaction and you are an employee, you should raise it formally in line with our Grievance procedure which can be found within your Contract of Main Terms and Conditions/Employee's Handbook.

Compliance within the Supply Chain

- We will ensure that our existing supply chain is compliant with the Modern Slavery Act 2015. We will research all associated web site addresses to ensure that their Annual Statement & Policy are in place and that they comply with our own policy as a minimum standard.
- We will keep an updated data base on our shared 'p' drive which allows access to all employees. The data base will indicate compliance and non-compliance. Only those in the supply chain who show as compliant will be cleared for use.
- If non-compliance is found we will contact the supplier concerned and request copies of their Annual Statement and Policy. If these are not presented and accepted within 28 days the relevant supplier will be struck off the recommended list, this will be open to review when an acceptable Policy is presented.
- Jonathan Pudney will conduct an annual audit to ensure that our supply chain policies are in place and are fit for purpose.

Communication and Awareness of this Policy

- The Annual Statement and this policy will be available on our shared 'p' drive, copies will also be included in the Employees' Handbook and posted to our company website.
- Our zero-tolerance approach to modern slavery will be communicated during the induction phase for all new employees and will be shared on Princebuild Yammer annually. This will include the updated annual statement.

Breaches of this Policy

- Any employee who breaches this policy will face disciplinary action, which, in some circumstances, could result in dismissal for gross misconduct.
- We may terminate our relationship with other suppliers, individuals and organisations working with us or on our behalf if they breach this/their policy.

Jonathan Pudney
Director

A handwritten signature in black ink, appearing to read 'Jonathan Pudney', with a long horizontal stroke extending to the right.

Dated: 08 January 2024