

## Modern Slavery & Human Trafficking Policy

### 1. Purpose

Simbec Orion Simbec Orion has a proactive approach to mitigating modern slavery and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts. While no such abuse is tolerated, an open and transparent approach is required by the Company and our clients, to ensure we take steps to identify and tackle any instances of modern slavery.

We believe that everyone has a right to be treated with dignity and respect at all times and under all circumstances and our Code of Business Ethics states that everyone working for Simbec Orion, is responsible for ensuring that we meet the highest ethical standards of integrity, courtesy and mutual respect.

### 2. Scope

This policy is effective from 1 January 2025 and is non-contractual, entirely discretionary and can be amended or changed at any time. It applies to employees of Simbec-Orion.

### 3. Policy

This policy provides a framework to ensure:

- All persons working for Simbec Orion, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents and contractors understand and are aware of their responsibilities in relation to modern slavery.
- The development of a strategic approach to identifying and tackling any modern slavery within Simbec Orion or their clients.
- The implementation of robust, transparent and proportionate governance and assurance processes.
- Reporting of instances (or concerns) of modern slavery.

#### Definitions

Modern slavery is an umbrella term that encompasses a wide spectrum of crime, including human trafficking, slavery, servitude, and forced labour and the associated criminal offences are defined within the Modern Slavery Act 2015 (the 'Act').

The term refers to situations of exploitation where a person cannot leave due to coercion, use of force, abuse of vulnerability, deception or other means. It is the illegal exploitation of people for personal or commercial gain and is a violation of fundamental human rights.

Human trafficking is where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

**Vendor Responsibilities**

Simbec Orion requires all organisations with whom it is engaged to ensure that their goods, services, materials and labour-related supply chains:

- Fully comply with the Act.
- Are clear, transparent, accountable and auditable.
- Are free from ethical ambiguities.

Simbec Orion expects that its clients operate to the highest level of ethical standards and will hold their own suppliers to the same high standards.

Simbec Orion is an accredited Living Wage employer. We are committed to paying all employees and contractors at least the Living Wage.

Simbec Orion will raise awareness of this policy (and the Act) by notifying clients, suppliers and other organisations with which we regularly engage and will look for opportunities to raise awareness of modern slavery and human rights abuses. Appropriate training and guidance will be provided for all employees.

Training will include how to identify the risks of modern slavery and ensure that suspected instances are handled correctly.

Supplementary training will be made available for commercial and procurement employees. This training will be mandatory for contract managers responsible for high-risk or high-value contracts.

Simbec Orion will provide modern slavery information, advice and guidance to contractors. Where feasible, Simbec Orion may also extend modern slavery training to contractors (however, contractors will remain responsible under the Act and retain their overall responsibility for providing training internally to their employees).

Simbec Orion will maintain records of all members of the Simbec Orion community who have completed modern slavery training.

**Assurance and Transparency**

Simbec Orion has committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within the Company. We take a risk-based approach to procurement, contract management and supply chain management processes in relation to modern slavery and keep them under continuous review.

To supplement this policy, Simbec Orion will voluntarily publish an annual Modern Slavery Statement for each financial year, which will include details of activities undertaken by Simbec Orion and its supply chains to combat modern slavery.

The Statement will be published on the [UK Simbec Orion website](#).

**Non-Compliance, Reporting and Victim Support**

If any person working for Simbec Orion, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents and contractors is discovered to have breached this policy, then appropriate action will be taken.

Individuals who have reasonable suspicion or evidence of modern slavery or non-compliance with the Act must immediately report their concerns to [human.resources@simbecorion.com](mailto:human.resources@simbecorion.com), a member of the Senior Leadership Team or via the Whistleblowing Line.

Simbec Orion will take a victim-centred approach to protect any victims of modern slavery from further harm or vulnerability. We will always act on a case-by-case basis, considering individual circumstances. We aim to follow a collaborative approach with our supply chain, only terminating contracts as a last course of action.