



Modern Slavery Statement

Sokin opposes all forms of slavery which consists of but is not limited to: human trafficking, drug trafficking, sex trafficking, and unpaid labour. We make this statement to set out the steps we have taken to adhere to the requirements of the Modern Slavery Act 2015 and to reflect a drive to eradicate modern slavery in commercial organisations within our supply chain.

We are committed to ensuring that our business has no involvement in modern slavery or human trafficking and will not support or deal with any business knowingly involved in modern slavery or human trafficking.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains.

We have a Global Compliance Policy in place signed off at director level, which applies to all employees across the Sokin Group, to reflect and enforce our commitment to conduct all our business in an honest and ethical manner. This includes our anti-slavery and human trafficking policy, to implement and enforce systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or in our supply chains.

Impact on our Supply Chains

Our supply chains are made up of the following:

- IT services and communications including customer support activities
- Financial institutions and payment processors
- Building services
- Data storage services
- Professional services from our advisers including our lawyers, accountants, auditors and public relations advisers
- Cleaning services
- Security services

The vast majority of our suppliers are based in Europe and North America. They are required to take steps to prevent modern slavery and human trafficking in their own businesses and supply chains, whether under the Modern Slavery Act 2015 or equivalent legislation in other jurisdictions.

Supplier adherence to our values

We have a Global Procurement Policy in place to ensure a controlled, transparent, auditable and compliant procurement service, and which is approved by our Chief Operating Officer. Our employees are required to complete appropriate due diligence analysis to ensure that prospective suppliers are qualified to conduct business with Sokin.

We take supplier management and performance seriously. Decisions on potential suppliers are taken based not only on price and delivery times, but other factors including the supplier's ability to deliver while maintaining compliance with applicable laws and, where the supplier has previously been engaged by us.

Wherever possible we seek to procure goods and services from an existing supplier already known to the Sokin Group, which allows us to better understand our suppliers' operations and policies and to build strategic, long-term relationships with those suppliers.

To ensure all those in our supply chain and contractors comply with our values, we have a rigorous supply chain compliance programme in place. This currently consists of the following measures:

- Purchases from suppliers are made using terms and conditions, which include:
 - A representation and warranty from the supplier that neither it nor any employee has been convicted of any slavery or human trafficking offence, nor been the subject of any investigation into any alleged slavery or human trafficking offence;
 - An obligation on the supplier to comply with all applicable laws, and specifically the Modern Slavery Act 2015;and
 - The right for Sokin to immediately terminate the supply agreement if the supplier breaches its compliance obligations.
- In addition, when conducting due diligence on potential suppliers for major projects, we require them to complete a detailed due diligence questionnaire. This covers topics such as supplier profile, size and history, and requires suppliers to provide references from previous business partners. The supplier is also required to respond on a number of legal and regulatory topics, which includes a requirement for the supplier to confirm upfront as part of their proposal that they are familiar with and shall comply with the Modern Slavery Act 2015;
- Any supply agreements made on the supplier's terms are duly reviewed by our Legal teams to ensure that the supplier is obliged to comply with all applicable laws.

Training and compliance

All Sokin employees are required to undertake modern slavery e-learning that focuses on how we mitigate the risk of modern slavery and human trafficking in our supply chain, our third parties, and customer base and direct operations.

All employees are also required to read, understand and commit to follow our Global Compliance Policy which includes detailed whistleblowing procedures to enable and encourage employees to express concerns regarding any misconduct or wrongdoing related to our business. All concerns will be investigated and appropriate remedial actions taken. Sokin has a zero tolerance policy to retaliation and will always maintain the whistleblower's confidentiality, to the extent permitted by law.

Future steps

We will monitor the effectiveness of the measures that we are taking to ensure that there is no slavery or human trafficking in our business or our supply chain, including building upon and improving the policies that we have put in place. This statement was approved by the board of directors and is reviewed annually.