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5. Modern Slavery Policy

5.1. Purpose

Probiotec is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

This policy applies to all persons working for and/or on behalf of the company, in any capacity, including all employees, contractors and any other third-party representative.

5.2. What do we mean by Modern Slavery?

Modern slavery can take many forms; it is a complex and multi-faceted problem. The Modern Slavery Act (MSA) 2018 covers four key criminal activities:

- Slavery: where ownership is exercised over an individual.
- Servitude: involves the obligation to provide service imposed by coercion.
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them.

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the MSA, include, but are not limited to:

- Child Labour: whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

*Child is defined as any person under fifteen years of age, unless a national or local law stipulates a higher minimum working age, in which case the higher age will apply.

*Employment of individuals under eighteen years of age (but over fifteen years of age and above the minimum working age) is permitted and appropriate in non-hazardous roles.

All forms of modern slavery have in common, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

5.3. Our Approach

To underpin the commitments laid out in this policy, Probiotec aims to adhere to the following guidelines:

- The focus of our implementation is on the human rights that are most relevant to our operations and supply chain.
- Our approach is inclusive of the internationally recognized human rights set out in the United Nations Universal Declaration of Human Rights.
- We are committed to ensure that there is no modern slavery nor child labour in our operation and supply chain.
- We monitor and review the effectiveness of relevant internal policies and how these have been implemented across our business areas.

5.4. Our Focus – Modern Slavery Policy

Probiotec is committed to the following principles, to ensure that there is no modern slavery and labour related harm from our operations and supply chain:

- No child labour or forced labour is used, and that employment is freely chosen.
- Workers have fair wages and employment agreements.
- Work hours do not exceed the maximum limit set by relevant legislation.
- Everyone has the right to form and to join trade unions for the protection of their interests.
- Workers experience fair and equal treatment and access to opportunity and enjoy a work environment that is free of discrimination, harassment, intimidation or coercion relating directly or indirectly to the protected attributes.
- All workers' health and safety is protected in the workplace.
- Workers have access to fair procedures and remedies.

5.5. Responsibility for this Policy

The CEO has the overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

All Managers are responsible for ensuring that their subsidiary complies with the provisions of this policy in the day to day performance of their roles.

5.6. Breaches of this Policy

A breach of this policy by an employee of the company may lead to disciplinary action being taken in accordance with the Company's Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

All employees will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the Human Resources Department.

5.7. Development and Review

Probiotec is committed to continuously improving its human rights policy (adhering to the Modern Slavery Act 2018) by monitoring and evaluating progress on a regular basis and working collaboratively with affected stakeholders.