

## **Eazi-Business Anti-Slavery and Human Trafficking Policy (Internal Use Only)**

### **Our Commitment**

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. We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to 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 also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015 (although our related Statement is provided on a voluntary basis since we do not meet the criteria for an obligatory statement). We expect the same high standards from all of our contractors, service providers, suppliers and other business partner. As part of our contracting processes, where possible 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.

### **Who We Are**

“We” “our” or “us” refers to the licensor company, Eazi-Business Limited. We are a limited company registered in England and Wales with registered number 08364226 and registered office at The Old School House, 65A London Rd, Oadby, Leicester LE2 5DN, UK (also using various trading names such as Eazi-Apps, Eazi-Sites, Eazi-SEO). This licensor company and all licensees in the network have no responsibility or liability for other licensees, who are all separate legal entities, nor for their personnel.

### **Who Must Comply with This Policy**

This policy applies to everyone when working for us, with us or on our behalf in any capacity, including employees at all levels, directors, officers, owners, licensees, agency or seconded workers, interns, agents, contractors, consultants, service providers, third-party representatives and business partners.

Our licensees must also ensure compliance within their own business and personnel with this policy or their own policy. Their own policy must include obligations and prohibitions at least at the level of those in this Policy but must be adapted for their local legislation to comply with any additional or further requirements under that legislation.

### **Responsibility for the policy**

Our directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. They also have responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and checking internal systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. Any comments, suggestions and queries are welcome to aid improvements in our systems.

## Detection and Notification of Potential Modern Slavery

The prevention, detection and reporting of modern slavery in any part of our business or supply chains 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 your manager or the directors 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 suspicion of modern slavery in any part of our business or supply chain or that of any service provider or supplier at the earliest possible stage. You should raise concerns even if you are unsure about whether or not a particular act or the treatment of workers constitutes any of the various forms of modern slavery.

Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

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 ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of our business or our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the directors immediately.

## Communication, Training and Awareness of This Policy

Training on this policy, and on the risk of modern slavery in supply chains, should be part of the induction process for all individuals, with updates as necessary. In addition, where possible you should require similar training by all business partners of their staff and supply chain.

Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated (which can include a copy of this policy) where possible to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate on an ongoing basis.

## Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect. In addition, you may face consequences for illegal action since slavery and human trafficking are illegal in most countries.

## Record-keeping

You must declare and keep a written record of all inspections and reviews of service providers or anyone in our supply chain (including any virtual or physical inspections) in the context of this policy. In addition, you should keep records of training on this policy.

## Changes to This Policy

We keep this Policy under review. The date that it was last updated is set out below. As a result of our reviews, we reserve the right to make changes to this Policy. The current version of this Policy is the one published at the relevant time on our internal website for us, our personnel or licensees.