

Sharesy Ltd
1 Beauchamp Court
10 Victors Way
Barnet
Hertfordshire
England
EN5 5TZ

Sharesy Anti-Slavery and Human Trafficking Policy

1. Purpose

We, Sharesy, are committed to maintaining ethical business practices and upholding human rights throughout our operations, our business dealings and relationships. This policy outlines our stance against all forms of modern slavery, servitude, human trafficking, forced and compulsory labour, and child labour, ensuring that they have no place within our organisation or supply chain, where possible.

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 where reasonable and proportionate to do so, consistent with disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we will, where reasonable and proportionate to do so 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 the same high standards from all of our contractors, suppliers and other business partners.

2. Our Commitment

Sharesy is committed to:

- **Zero Tolerance:** We take a zero-tolerance approach to modern slavery, servitude, human trafficking, forced and compulsory labour, and exploitation in all forms.
- **Compliance with Laws:** We adhere to all relevant laws and regulations, including the UK Modern Slavery Act 2015, and similar anti-slavery legislation in the countries where we operate.

- **Ethical Operations:** Our business practices aim to prevent exploitation, both within our company and throughout our supply chain where reasonable and proportionate to do so, ensuring that all workers are treated with dignity and respect.

3. About this policy

The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers, business partners and any other individuals or entities working with Sharesy.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

4. Our Responsibilities

The board of 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.

The compliance manager Felix Atkin has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control 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.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Felix Atkin. Please note that we are not obligated to carry out any suggestions made by you, we have reserve full discretion on what changes are made to this policy.

5. Your Responsibilities

You are responsible for:

- familiarising themselves with this policy and understanding the issues related to modern slavery and human trafficking and complying with the policy.
- prevention, detection and reporting of any suspected cases of modern slavery or human trafficking either within the company or in its supply chain where reasonable and proportionate to do so. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- acting ethically and professionally in all dealings, ensuring that their actions contribute to a working environment free from any form of slavery or exploitation.
- notifying Felix Atkin as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.
- raising concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect that a breach of this policy has occurred or that it may occur you must report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or through the confidential Modern Slavery Helpline: 08000 121 700.

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 of whatever form is or may be taking place in any part of our own business or in any of 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 one of the compliance managers immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance policy.

6. Supplier Code of Conduct

Where reasonable and proportionate to do so we will ask our suppliers and business partners to adopt the following:

- **Prohibition of Forced Labour:** No use of forced, bonded, or involuntary labour, including human trafficking or debt bondage.

- **Child Labour Prohibition:** No use of child labour, in accordance with International Labour Organisation (ILO) standards.
- **Working Conditions:** Safe and healthy working conditions, fair wages, and adherence to legal working hour requirements.
- **Legal Compliance:** Full compliance with all relevant local and international labour and human rights laws.
- **Transparency:** Openness in reporting on labour practices, ensuring no form of exploitation occurs at any stage of the supply chain where reasonable and proportionate to do so.

7. Due Diligence and Risk Management

To prevent and identify the risks of modern slavery in our operations, Sharesy employs the following measures:

- **Supplier Assessments:** Our zero-tolerance approach to modern slavery in our business and supply chains (where reasonable and proportionate) should be communicated to all suppliers, contractors and business partners at the outset of the business relationship. We may also conduct reviews and audits of our suppliers, contractors and business partners to ensure compliance with our anti-slavery standards.
- **Risk Assessments:** We will identify areas in our supply chain (where reasonable and proportionate to do so) that may be at risk of modern slavery and take steps to mitigate these risks.
- **Training:** We provide training to our employees, as and when appropriate, to help them recognise the signs of modern slavery and understand the proper reporting channels.

8. Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

9. Reporting Concerns

Sharesy encourages employees, suppliers, and stakeholders to report any concerns regarding modern slavery and human trafficking. Reports can be made confidentially

through our whistleblowing procedures, which ensure anonymity and protection from retaliation.

All reports will be thoroughly investigated, and appropriate corrective actions will be taken, which may include terminating relationships with suppliers or partners found to be in violation of this policy.

10. Monitoring and Review

This policy will be reviewed annually to ensure it remains effective and relevant in addressing risks related to modern slavery. We are committed to continuous improvement and will implement necessary changes as part of our ongoing commitment to ethical business practices.

By following this policy, Sharesy reaffirms its dedication to maintaining an environment free from exploitation and upholding human rights at every level of our business operations.

Signed:



Felix Atkin

Founder & CEO, Sharesy

20th December 2024