



Carbonbit Ltd

MODERN SLAVERY AND HUMAN TRAFFICKING

Policy Document

1. Policy Statement

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 to exploit them for personal or commercial gain. Carbonbit Limited has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or supply chains.

Carbonbit is committed to ensuring that there is transparency in our own business and in its approach to tackling modern slavery throughout its supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all contractors, suppliers, and other business partners, and as part of our contracting processes, the Company includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for Carbonbit or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

2. Responsibility for the Policy

The board of directors has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under our control comply with it.

The Managing Director 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.

All stakeholders 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 the Managing Director.

3. Compliance with the Policy

All stakeholders must ensure they have read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of Carbonbit or its supply chains is the responsibility of all those working for the Company or under its control. All stakeholders are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All stakeholders must notify their manager (if you are an employee of Carbonbit) or the Managing Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Carbonbit encourages all stakeholders to raise concerns about any issue or suspicion of modern slavery in any parts of its business or supply chains of any supplier tier at the earliest possible stage.

If there is a believed or suspected breach of this policy or that it may occur, you must notify your manager or the Managing Director as soon as possible.

If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Managing Director.

Carbonbit 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. The Company is 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 any stakeholder believes they have suffered any such treatment, they should inform the Legal Director immediately. If the matter is not remedied, (and you are an employee), this should be raised formally using the Company Grievance Procedure.

4. Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for Carbonbit, and regular training is to be provided as necessary. A copy of this policy is available on the Company's intranet.

Carbonbit's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Breaches of this Policy

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

The Company may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

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



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Philip Hargreaves
Chief Executive

Dated: 31st January 2023