

ANTI-SLAVERY POLICY STATEMENT

Version: 1.3

Approval Date: 13th August 2025

Approved by: Board of Directors

Next Review Date: August 2026

1. Purpose

Finsen Technologies Limited ("Finsen" or "the Company") is committed to the highest ethical standards and the elimination of all forms of modern slavery, human trafficking, forced labour, and child labour. This policy sets out our commitment to act ethically and with integrity in all our business dealings and relationships, and to implement effective systems and controls to ensure slavery and human trafficking are not taking place in our business or supply chains.

2. Scope

This policy applies to:

- All employees, directors, and officers of Finsen Technologies Limited
- All suppliers, contractors, agents, and consultants engaged by Finsen
- All business operations and global supply chains connected to Finsen's activities

3. Definitions

For the purposes of this policy, Modern Slavery includes:

- Forced labour – work or services extracted under threat or coercion
- Debt bondage – work to repay a debt under unfair terms
- Human trafficking – recruitment, transport, or harbouring for exploitation
- Child labour – employment of children in breach of international standards
- Servitude – the obligation to live and work for another under coercive conditions

4. Policy Statement

Finsen maintains a zero-tolerance approach to modern slavery. We expect the same commitment from all organisations with which we do business.

We will:

- Comply with all applicable laws and regulations relating to modern slavery and human trafficking
- Incorporate anti-slavery obligations into all supplier and partner contracts
- Conduct regular due diligence and audits of suppliers based on risk
- Provide training to employees and suppliers on identifying and addressing modern slavery risks
- Take appropriate disciplinary action against employees or terminate contracts with suppliers who breach this policy

5. Roles and Responsibilities

- Board of Directors: Ultimate responsibility for ensuring this policy is implemented and reviewed annually.
- Compliance Officer: Manages anti-slavery initiatives, training, supplier audits, and risk assessments.
- Managers: Ensure team compliance, report concerns, and monitor supplier adherence.
- Employees: Comply with the policy and report any concerns without fear of retaliation.

6. Due Diligence Process

We will:

- Map our supply chains and assess risks using recognised indicators
- Conduct background checks and compliance screening before engaging suppliers
- Request suppliers to complete a Modern Slavery Self-Assessment Questionnaire (SAQ)
- Carry out site inspections where appropriate
- Require corrective action plans for identified risks

7. Risk Assessment

Our risk assessment process evaluates:

- Geographic risks – countries with weak labour laws or high slavery prevalence
- Sector risks – industries with known forced labour issues
- Operational risks – use of migrant, agency, or low-skilled labour
- Transactional risks – complexity and length of supply chains

8. Training

All employees must complete annual training on:

- Understanding modern slavery and human trafficking
- Recognising signs of exploitation
- Reporting mechanisms and whistleblowing protections
- Suppliers are encouraged to attend workshops and receive educational materials on ethical labour practices.

9. Reporting Concerns

We encourage the reporting of any concerns about modern slavery, whether involving our operations or our supply chain.

- Reports can be made via email to compliance@finsentech.com
- All reports will be investigated promptly and confidentially, with protection for whistleblowers.

10. Breaches of This Policy

Any breach of this policy by employees may result in disciplinary action, up to and including dismissal. For suppliers or contractors, breaches may result in termination of business relationships and legal action.

11. Review

This policy will be reviewed annually or sooner if:

- There are significant changes in legislation
- Risks change in our supply chain
- Improvements are identified during audits or incident investigations

12. Proportionality for a Small Business

We aim for **meaningful yet manageable steps**:

- Focus on Tier 1 supplier oversight.
- Use simple, clear SAQs and checklists rather than exhaustive audits.
- Prioritise training and awareness over complex systems.
- Ensure transparency and improvement, not perfection—reflecting SME-friendly guidance

Signed:

A handwritten signature in blue ink, appearing to read "Tristan Williams".

Tristan Williams

Chief Technical Officer, Finsen Technologies Limited / Finsen Technologies, Inc.