

Modern Slavery, Human Trafficking, and Human Rights Policy

Issued on behalf of Proicere Digital

Statement of Commitment

Proicere Digital is dedicated to upholding human rights and maintaining a zero-tolerance approach to modern slavery and human trafficking. We are committed to implementing robust systems and controls to ensure that slavery and exploitation are eradicated from our operations and supply chains. This policy aligns with the Modern Slavery Act 2015 and reflects our ongoing commitment to ethical and responsible business practices.

Purpose

The purpose of this policy is to outline Proicere Digital's approach to identifying, preventing, and addressing the risks of modern slavery and human trafficking in our operations and supply chain.

Scope

This policy applies to all individuals working for or on behalf of Proicere Digital, in any capacity, including employees, contractors, suppliers, agency workers, volunteers, and other stakeholders.

Policy Principles

1. Legal and Ethical Framework

- Proicere Digital strictly adheres to the **Modern Slavery Act 2015** and other applicable international human rights conventions.
- Our actions are guided by the **UN Guiding Principles on Business and Human Rights**, ensuring fairness, transparency, and accountability.

2. Prohibition of Modern Slavery

We strictly prohibit:

- The use of slavery, servitude, forced or compulsory labour, and human trafficking within our operations or supply chains.
- Exploitation of vulnerable individuals for economic or other gain.

3. Supply Chain Transparency

- All suppliers, contractors, and partners must comply with this policy.

- Suppliers are required to cascade these standards to their own subcontractors and demonstrate compliance through regular audits and reports.

4. Due Diligence and Risk Management

- Proicere Digital adopts a **risk-based approach** to identify and mitigate modern slavery risks.
- Regular assessments are conducted to evaluate the risk levels of our supply chains and operations.
- High-risk suppliers are subject to additional due diligence and audits.

5. Training and Awareness

- Our employees and contractors are provided with regular training on identifying and addressing modern slavery risks.
- Training ensures that staff understand their responsibilities and the mechanisms for reporting concerns.

Responsibilities

1. Employees and Contractors

- Employees must prevent, detect, and report any concerns related to modern slavery or human trafficking.
- Contractors and temporary workers are expected to uphold the same high standards as Proicere Digital employees.

2. Leadership

- Senior management is responsible for overseeing the implementation and effectiveness of this policy.
- Regular updates will be provided to the Board of Directors on compliance activities.

Reporting and Whistleblowing

- Proicere Digital encourages all employees, contractors, and suppliers to report concerns or breaches confidentially.
- **Whistleblowing:** Contact Karl Dooner, CEO
- **Email:** karl.dooner@proiceredigital.com
Reports will be investigated promptly, and Proicere Digital guarantees that no one raising a concern in good faith will face retaliation.

Commitments

1. **Risk-Based Contracting:**
 - Anti-slavery clauses will be included in all contracts with suppliers and third parties.

- Recruitment agencies and other labour suppliers must confirm adherence to this policy and our Code of Conduct.
- 2. **Actions for Breaches:**
 - Proicere Digital will take appropriate actions, ranging from remedial measures to termination of relationships, in cases of policy breaches.

Governance and Accountability

- This policy is reviewed annually and updated as required to reflect legal, industry, and operational changes.
- An annual **Modern Slavery Statement** will be published on our website, detailing the actions taken to address modern slavery risks.

Approved by:

Name: Karl Dooner

Position: CEO

Date: 09/12/2024