



# Anti-Slavery Policy

## Global

March 2026

<b>Introduction.....</b>	<b>3</b>
<b>1. Executive summary policy statement .....</b>	<b>3</b>
<b>2. About this policy.....</b>	<b>3</b>
<b>3. Responsibility for the policy .....</b>	<b>3</b>
<b>4. Your responsibilities and how to raise a concern .....</b>	<b>4</b>
<b>5. Communication and awareness of this policy.....</b>	<b>4</b>
<b>6. Breaches of this policy.....</b>	<b>5</b>
<b>7. Governance, Version Control &amp; Updates:.....</b>	<b>6</b>

# Introduction

This is the anti-slavery policy of Sabio Ltd and its group companies (“us”, “we”, “our”).

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.

## 1. Executive summary policy statement

1.1. 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 are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and 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.

1.2. 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 our 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 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.

1.3. Please also refer to Sabio's Code of Conduct, available here: <https://sabiogroup.com/legal/>

## 2. About this policy

2.1. 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 and business partners.

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

## 3. Responsibility for the policy

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

3.2. The Legal and People departments have 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. They are also responsible for ensuring that Sabio employees are given adequate and regular training on it and the issue of modern slavery in supply chains.

3.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

## 4. Your responsibilities and how to raise a concern

4.1. You must ensure that you read, understand and comply with this policy.

4.2. 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.

4.3. You must notify your manager (or your main point of contact at Sabio, if you are a supplier) as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.

4.4. You are encouraged to raise 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.

4.5. If you believe or suspect that a breach of this policy has occurred or that it may occur you must notify your manager (or your main point of contact at Sabio, if you are a supplier), or report it in accordance with our Whistleblowing Policy, as soon as possible.

4.6. 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, you must raise it with your manager (or your main point of contact at Sabio, if you are a supplier).

4.7. 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 by Sabio 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 the Chief People Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure.

## 5. Communication and awareness of this policy

5.1. Guidance on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

5.2. We provide annual training on identifying and preventing modern slavery in our business and supply chain. Participation is mandatory.

5.3. Our zero-tolerance approach to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis. This is done in particular by following our supplier due diligence process.

## **6. Breaches of this policy**

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

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

## 7. Governance, Version Control & Updates:

Document & Version	Classification	Date Live	Change description	Owner	Created	Approved
PO. V1	Public – Global	01/04/2017	Policy Creation	Legal Team	Director of Legal and Company Secretary	Director of Legal and Company Secretary
PO. V2	Public – Global	17/01/2019	New updated version	Legal Team	Director of Legal and Company Secretary	Director of Legal and Company Secretary
PO. V3	Public – Global	04/03/2021	New updated version	Legal Team	Director of Legal and Company Secretary	Director of Legal and Company Secretary
PO. V4	Public – Global	04/03/2024	New updated version	Legal Team	Head of Legal	Head of Legal
PO. V4	Public – Global	19/05/2025	Policy Annual Review 2025	Legal Team	Head of Legal	Head of Legal
PO. V5	Public – Global	31/03/2026	Policy Annual Review 2026. Minor amendments.	Legal Team	Head of Legal	CFO

This document will be reviewed on an annual basis and updated as relevant to Sabio Group.