



Modern Slavery and Human Rights Policy

Policy No:	0419/03
Version No:	03
Effective Date:	01/09/2023
Document Owner:	HR Team
Reviewed By:	EOS Sustainability Team
Document Review:	Yearly

Introduction

As an equal- opportunity employer, we are committed to develop an organizational culture globally which develops and implements policies and procedures in aims to combat modern slavery and violation of human rights. EOS is fully supportive of **Modern Slavery Act 2015** and the principles contained within the **UN Guiding Principles on Business and Human Rights**. We're working hard to guard against being complicit in any type of modern slavery and human rights violations and to uphold the human rights of our people and any other individuals we are in contact with, either directly or indirectly by creating and ensuring a non-discriminatory and respectful working environment.

EOS has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure no breach of modern slavery and human rights is taking place anywhere in our own business or our supply chain. EOS is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain by providing open communication through our internal and external channels.

Organizational Scope

This policy applies to all Employees and Directors of the Company, and to all associated persons within the UK and overseas, all of whom are responsible for maintaining the highest standards of business conduct. Where reference is made to EOS, this includes all companies and associated persons within the EOS Group. We expect the same high standards from all our contractors, suppliers and other business partners, this requirement is also addressed in our Supplier Code of Conduct.

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, and we expect that our suppliers will hold their own suppliers to the same high standards.

Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the persons concerned.

Policy Objectives

This policy sets out our position with respect of human rights and modern slavery and sits alongside with our Employee Handbook, Health and Safety Policy, Supplier Code of Conduct and Ethical Sustainable Procurement Policy.

Human trafficking: EOS prohibits within its supply chain the act of recruiting, transporting, transferring a person through coercive means for the purpose of exploitation. We have a zero-tolerance approach towards human trafficking.

Forced labour: EOS requests all suppliers, contractors, and third-party organisations to submit declaration at tendering/ awarding stage on forced labour which is known as work or service that is taken from a person under the menace of a penalty and for which the person has not offered themselves voluntarily.

Debt bondage: As a global organisation we recognise the importance of monitoring debt bondage risk in countries which this is a regular practice. Debt bondage is a worker pledging their labour or the labour of others under their control as security for a debt; when either the real value of the work undertaken is never applied to repayment of the debt, or the length and nature of the work that must be undertaken is never fully defined or limited.

Child Labour: EOS will ensure use of child labour is not applicable in their supply chain and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships and other similar programmes that comply with the applicable laws and regulations.

Health, Safety and Hygiene: All EOS employees will work in an environment that is both safe and healthy, in line with our Health and Safety Policy.

Discipline: EOS prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated to all employees in our Employee Handbook. All disciplinary measures of a serious nature are recorded and actioned.

Freedom of Association and Employee Representation: EOS recognises that all its employees have the right to form and join organisations of their wish if this does not contravene the organisations policy, which ensures our independence, in line with the regulatory requirements of EOS.

Working Hours: EOS will ensure that working hours are reasonable and comply with the law and industry requirements and standards applicable in each country of trading.

Equality of Treatment: EOS is fully committed to eliminate discrimination in recruitment process, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability, or social origin and to promoting equality of opportunity and fair treatment as outlined in the Employee Handbook.

Employment terms: EOS will issue written and clear contracts at hiring stage which detail the terms and conditions of employment. We will ensure that work performed by employees adheres to employment laws and practices in all countries EOS has an established business.

Remuneration: EOS will commit to provide wages and benefits that meet national standard requirements in each country of trading.

Prevention and Detection

The prevention, detection, and reporting of modern slavery in any part of our business or supply chain 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. You must notify your manager or HR Department as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

Reporting suspected offences

Employees and associated persons are required to assist the company and to remain vigilant in preventing, detecting, and reporting breaches. They are encouraged to report any concerns that they may have to the HR Director as soon as possible. Issues that should be reported include:

- any suspected or actual attempts of breach in policy.
- concerns that other employees or associated persons may be in breach; or
- concerns that other employees or associated persons may be in breach, such as clients or Government officials.

Employees or associated persons who report instances of breaches in the policy in good faith will be supported by EOS. Measures will be put in place to ensure that the individual is not subjected to detrimental treatment because of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager; employees and associated persons should not co-operate. They should report the matter to the HR Director in the first instance.

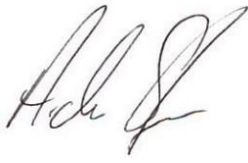
Communication, Review & Training

Communication and Review: EOS will regularly review and communicate new implemented policies and measures to all internal and external stakeholders

Training: EOS will create awareness and training on Modern Slavery & Human Rights for all new employees in first seven days from hiring and every six months training for all members of staff globally.

Review: EOS will review this policy on yearly basis and reserves the right to amend and update policy in line with internationally recognised modern slavery and human rights and standards such as Modern Slavery Act 2015, ILO (Internationally Labour Organisation) or United Nations Guiding Principles on Business and Human Rights.

Approved and signed on behalf of the EOS IT Management Solutions Ltd Senior Management Team by:

A handwritten signature in black ink, appearing to read 'Aidan Sloyan', written in a cursive style.

Aidan Sloyan
Chief Commercial Officer