

INOCEA UK LIMITED MODERN SLAVERY STATEMENT

POLICY OWNER	MARIA PATTERSON
ACCESS RIGHTS	ALL STAFF
APPROVAL REQUIREMENTS	THE BOARDS OF: INOCEA UK LIMITED MARIA PATTERSON – GROUP COO
VERSION DATE	1 JULY 2022
NEXT REVIEW	1 JULY 2023

CONTENTS

- 1. POLICY STATEMENT
- 2. RESPONSIBILITY FOR THE POLICY
- 3. COMPLIANCE WITH THE POLICY
- 4. COMMUNICATION AND AWARENESS OF THE POLICY
- **5. BREACHES OF THE POLICY**

1. 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 to exploit them for personal or commercial gain. Inocea UK Limited ("INOCEA") has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any part of its supply chain.
- **1.2.** INOCEA is also committed to ensuring that there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015. INOCEA expects the same high standards from its contractors, suppliers, and other business partners.
- **1.3.** This policy applies to all persons working for INOCEA or on its behalf in any capacity, including employees at all levels, directors, officers, interns, agents, contractors, external consultants, third-party representatives, and business partners.
- **1.4**. This policy does not form part of any employee's contract of employment.

2. RESPONSIBILITY FOR THE POLICY

- **2.1.** The Board of INOCEA has overall responsibility for ensuring that this policy complies with legal and ethical obligations, and that all of those under its control comply with it.
- **2.2.** Maria Patterson has primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness.
- **2.3.** Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

3. COMPLIANCE WITH THE POLICY

- **3.1.** The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the responsibility of all those working for INOCEA. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- **3.2.** Employees must notify their line manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- **3.3.** Employees are encouraged to raise concerns about the issue or suspicion of modern slavery in any part of the business or supply chain at the earliest opportunity.
- **3.4.** If an employee is unsure about any situation that may be a breach of the Modern Slavery Act, they must raise their concern with Maria Patterson as quickly as possible.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- **4.1.** Appropriate training on this policy, and on the risk to the INOCEA's business faces from modern slavery in its supply chains will be provided as necessary to targeted staff.
- **4.2.** INOCEA's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

- **5.1.** Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- **5.2.** INOCEA may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.