



Modern Slavery and Human Trafficking Policy

Cairn Technology Ltd is committed to preventing modern slavery and human trafficking in all its forms. This policy outlines our commitment to acting ethically and with integrity in all our business relationships.

Policy Statement

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.

Cairn Technology Ltd 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.

We will undertake due diligence to assess and manage potential risks of modern slavery and human trafficking in our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers.

The following requirements will be expected of all suppliers:

1. They will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty.
2. They will ensure that the overall terms of employment are voluntary.
3. They will comply with the minimum age requirements prescribed by applicable laws.
4. They will compensate workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
5. They will abide by applicable law concerning the maximum hours of daily labour.
6. They will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK.
7. They will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to Cairn Technology Ltd, also adhere to these requirements.

Any of our supply chain members who are found to have or be engaging in human trafficking and slavery or which refuse to cooperate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with the company terminated immediately, without compensation.

Cairn Technology Ltd shall also take such other (remedial) steps as we determine to be necessary to address the violation and seek to prevent its reoccurrence.





Responsibility for the policy

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

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.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director, Peter Binns. Peter.binns@cairntechnology.com.

Compliance

We will comply with all relevant laws and regulations regarding modern slavery and human trafficking.

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. Our employees are expected to report any concerns promptly.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director as soon as possible.

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 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.

Training and Awareness

When required we will provide training to our employees to raise awareness about modern slavery and human trafficking issues, equipping them to identify and prevent such activities.

Continuous Improvement

We are committed to reviewing and improving our processes and policies regularly to ensure their effectiveness in preventing modern slavery and human trafficking.

Communication

This policy will be communicated to all employees, suppliers, and stakeholders.

Signed:

Dr Mark Fields
Managing Director

Dr Peter Binns
Managing Director

