



| Version | Date of Issue | Author | Summary of Changes |
|---------|---------------|-----------|--------------------|
| 1 | Jun-2024 | Shai Hill | First Policy |

Introduction

Modern slavery is an immoral act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Integrum ESG, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business.

Our business and supply chains

Integrum ESG assesses both ESG risks and positive sustainability impacts for investment portfolios. We are based in London, United Kingdom. We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Policies

Integrum ESG operates the following policies for identifying and preventing slavery and human trafficking in our operations:



- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Purchasing Code - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

Supplier due diligence

Integrum ESG commits to researching suppliers during on-boarding and thereafter at regular intervals to ensure that:

- They do not use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They do not require employees or any relatives or friends of any employee to post a deposit/bond and do not withhold their salaries for any reasons
- They do not require employees to surrender their passports or work permits as a condition of employment