

**EU MODERN SLAVERY &
HUMAN RIGHTS COMPLIANCE
POLICY**



MODERN SLAVERY AND HUMAN RIGHTS COMPLIANCE POLICY

SUMMARY FOR EMPLOYEES

Key Policy Commitments

- The Company has a zero-tolerance approach to modern slavery and human trafficking.
- This policy applies to all employees, contractors, suppliers, and third parties working with the Company.
- We conduct due diligence on suppliers and require compliance with our Supplier Code of Conduct.
- Training is provided to employees to identify and prevent modern slavery risks.
- Concerns can be reported confidentially and anonymously under our Whistleblowing Policy.
- Non-compliance may result in disciplinary action, termination of contracts, or reporting to authorities.



1. PURPOSE AND COMMITMENT

Tentamus Group is committed to respecting human rights and eliminating all forms of modern slavery, forced labour, child labour, and human trafficking in accordance with:

- The EU Charter of Fundamental Rights
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The forthcoming EU Corporate Sustainability Due Diligence Directive (CSDDD)
- The OECD Guidelines for Multinational Enterprises

We recognise our responsibility to take proactive steps to identify, prevent, and mitigate modern slavery risks within our operations and global supply chains.

2. SCOPE

This policy applies to:

- All employees, officers, and directors of Tentamus Group.
- Subsidiaries, affiliates, and joint ventures under our operational control.
- Contractors, consultants, agency staff, and temporary workers.
- All suppliers and business partners providing goods or services to Tentamus Group companies.

3. DEFINITIONS

- **Modern Slavery:** Encompasses forced labour, servitude, bonded labour, child labour, and human trafficking.
- **Forced Labour:** All work or service exacted under threat or penalty and not voluntarily undertaken.
- **Human Trafficking:** The recruitment, transportation, or harbouring of persons by coercion or deception for exploitation.
- **Supply Chain:** All tiers of suppliers, including direct and indirect business partners.
- **Due Diligence:** Ongoing risk assessment and monitoring processes to identify and address human rights risks in operations and supply chains.

4. LEGAL AND REGULATORY FRAMEWORK

Tentamus Group will ensure compliance with:

- EU Corporate Sustainability Due Diligence Directive (CSDDD).
- EU Non-Financial Reporting Directive (NFRD) and Corporate Sustainability Reporting Directive (CSRD).
- UK Modern Slavery Act 2015.
- International Labour Organization (ILO) Core Conventions.

5. POLICY COMMITMENTS

Tentamus Group commits to:

- Zero tolerance for modern slavery and forced labour.
- Full compliance with EU regulations and international standards.
- Continuous improvement in identifying and mitigating risks.

6. RESPONSIBILITIES

Directors – Group Board Directors and Local Country Directors

- Approves this policy and oversees compliance.

Senior Management – Functional Leaders, Country Managers and Lab Managers

- Ensures integration of human rights due diligence across operations.
- Allocates resources for training, audits, and supplier engagement.

Employees – including all contractors, consultants, agency staff and temporary workers

- Must comply with this policy.
- Report suspected cases of modern slavery or human rights abuse.

Suppliers & Partners

- Must sign and adhere to our Supplier Code of Conduct.
- Provide transparency on labour practices and subcontracting.



7. DUE DILIGENCE AND RISK MANAGEMENT

We apply a proportionate risk-based due diligence assessment framework, including:

1. Risk Identification – Regular assessments of suppliers, industries, and regions vulnerable to modern slavery.
2. Supplier Engagement – Ethical sourcing questionnaires, contractual obligations, and independent audits.
3. Monitoring – Ongoing reviews, supply chain mapping, and grievance mechanisms.
4. Corrective Action – Remediation plans for non-compliance; termination of contracts if risks are not addressed.

8. TRAINING AND AWARENESS

- Mandatory training for staff on human rights and modern slavery.
- Specialised training for Procurement, HR and Senior Management.

9. REPORTING AND GRIEVANCE MECHANISMS

- Employees and third parties can raise concerns in a confidential and anonymous manner in accordance with our Whistleblowing Policy.
- All allegations are investigated promptly and transparently.

10. TRANSPARENCY AND REPORTING

- Disclose identified risks, due diligence measures, and corrective actions taken.
- Ensure any associated reports are publicly available on our corporate website.

11. BREACH OF POLICY

- Employees in breach may face disciplinary action, up to and including dismissal.
- Suppliers may face suspension or termination of contracts.
- Where required, breaches will be reported to relevant EU or national authorities.

12. CONTINUOUS IMPROVEMENT

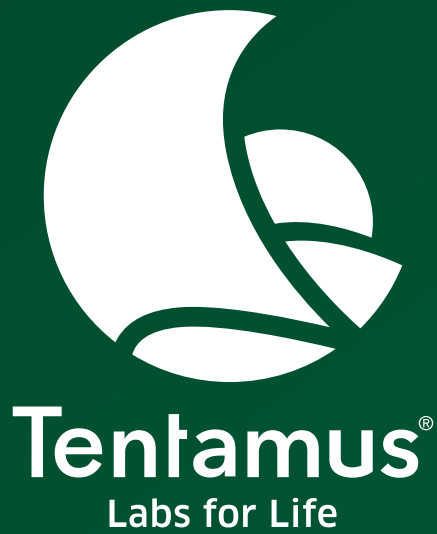
Tentamus Group commits to:

- Strengthening supply chain mapping and traceability.
- Collaborating with industry groups, NGOs, and regulators.
- Benchmarking against evolving EU human rights compliance standards.

13. APPROVAL AND REVIEW

This policy will be:

- Reviewed periodically, or earlier if EU regulations change.
- Updated to reflect evolving legal obligations and industry best practice.



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