



## SWARTUP ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

### 1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It includes various forms such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which involve depriving a person's liberty for personal or commercial gain.

1.2 Swartup is committed to a zero-tolerance policy for modern slavery within its operations and supply chains.

1.3 This policy applies to all:

- (a) persons working for or on behalf of Swartup in any capacity, including employees, directors, volunteers, interns, and agents, and
- (b) contractors, external consultants, agencies, third-party representatives, and business partners ("Suppliers"). Suppliers are expected to adhere to their own modern slavery policies if they have them.

1.4 Swartup is dedicated to:

- (a) Acting ethically and with integrity in all business dealings and relationships;
- (b) Ensuring performance indicators do not pressure or encourage risks of modern slavery;
- (c) Implementing and enforcing effective systems and controls to ensure modern slavery does not occur within our business or supply chains;
- (d) Maintaining a consistent and transparent approach to combating modern slavery in our company and supplier networks.

1.5 We expect high standards from all our Suppliers and include specific prohibitions against modern slavery in our contracts, requiring Suppliers to uphold these standards within their own supply chains.

### 2. IDENTIFYING MODERN SLAVERY

2.1 Modern slavery may exist in our business, supply chains, and outsourced activities.

2.2 Indicators of modern slavery include, but are not limited to:

- Distrust of authorities
- Expression of fear or anxiety
- Signs of psychological trauma
- Being controlled or instructed by another person
- Injuries indicative of assault or controlling measures
- Restricted movement and confinement
- Documents held by someone else
- Limited access to medical care
- Isolation and limited social contact



- Threats or coercion
- Poor living conditions and hygiene facilities
- Excessive working hours or wage deductions

### **3. TRAINING**

3.1 Swartup provides an online anti-slavery training module to all employees.

3.2 This policy is included in the onboarding training sessions.

### **4. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE**

4.1 The Management Board has overall responsibility for ensuring compliance with this policy.

4.2 The Head of People is responsible for implementing this policy and addressing any queries related to it.

4.3 All Swartup members must comply with this policy.

4.4 Each Supplier must comply with this policy or their own anti-slavery policy.

### **5. REPORTING MODERN SLAVERY**

5.1 Swartup members and Suppliers must report any incidents or suspicions of modern slavery immediately to:

- (a) Line Manager (for employees) or, if preferred, bypass anyone in the organization and directly report to the President of the organization.
- (b) Primary account manager or business contact at Swartup (for Suppliers)
- (c) For anonymous reporting, send an email to [email contact], which will be handled in accordance with Romanian law.

### **6. PUBLICATION OF THIS POLICY**

6.1 This policy is available to Swartup members on the internal company portal under the name ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY.

6.2 This policy is available to Suppliers on the company website [www.swartup.com].



## **7. BREACHES OF THIS POLICY**

7.1 Employees who breach this policy may face disciplinary action, including possible dismissal for misconduct.

7.2 The company may terminate relationships with Suppliers who breach this policy. Alternatively, Swartup may work with the Supplier to address and resolve issues.

## **8. POLICY REVIEW**

8.1 The Head of People is responsible for reviewing this policy to ensure it meets legal and ethical standards and reflects best practices.

8.2 This policy is not part of any employment contract and may be amended at any time.

8.3 Swartup members are encouraged to provide feedback and suggest ways to strengthen anti-slavery efforts by contacting the Head of People.

8.4 This policy was last updated on June 08, 2023, and will be reviewed annually on June 08.