

Celebrus Technologies plc
Anti-Slavery and Human Trafficking Policy
Last updated: November 2025

1. Purpose of this Policy

Celebrus Technologies plc ("Celebrus", "the Company") is committed to conducting business ethically, responsibly, and in full compliance with the UK Modern Slavery Act 2015. This policy outlines our zero-tolerance approach to all forms of modern slavery and human trafficking within our organisation and across our global supply chain.

2. Scope

This policy applies to:

- All employees, officers, and directors of Celebrus.
- All contractors, consultants, and temporary staff.
- All suppliers, service providers, and business partners in the UK, US, India, and any other territories where the Company operates.

3. Definition of Modern Slavery

Modern slavery encompasses slavery, servitude, forced or compulsory labour, bonded labour, child labour that contravenes international standards, and human trafficking. It includes any situation where a person is coerced, controlled, or exploited for another's gain.

4. Our Commitment

Celebrus is committed to:

- Preventing modern slavery in all its forms.
- Assessing and mitigating risks in our operations and supply chain.
- Conducting due diligence on key suppliers.
- Ensuring transparency consistent with Section 54 of the UK Modern Slavery Act.
- Promoting awareness and providing employees with guidance on recognising and reporting risks.

5. Governance and Responsibilities

- **Board of Directors:** Has ultimate oversight of the Company's compliance with the Modern Slavery Act.
- **CFO (Policy Owner):** Responsible for implementing and reviewing this policy annually, coordinating risk assessments, and ensuring inclusion in supplier governance and procurement processes.

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- **HR Team:** Ensures fair recruitment & compliance, right to work checks, and ethical employment practices.
- **Finance team and Chief Security Officer's team:** Maintains approved supplier lists, conducts supplier due diligence, and monitors ongoing compliance.
- **All Employees:** Must report any concerns or suspected breaches immediately.

6. Risk Assessment

By the nature of the business, Celebrus regards the risk as low but recognises that risks may arise in:

- Outsourced services or contractors (particularly offshore resource providers).
- Cloud and data-centre providers.
- Office facilities, cleaning, and security supply chains.
- Recruitment agencies and temporary labour providers.

Risk assessments will be reviewed annually and whenever new suppliers or markets are added.

7. Supplier Due Diligence and Controls

We expect all suppliers and partners to uphold equivalent standards. Celebrus will:

- Use supplier onboarding questionnaires that include modern slavery compliance questions.
- Require suppliers to confirm adherence to applicable labour laws and ethical standards.
- Review suppliers assessed as higher risk more frequently.
- Reserve the right to audit or terminate relationships with suppliers who do not meet our standards.

8. Training and Awareness

Celebrus provides training:

- On initial induction for new employees.
- Through annual review and communication to employees of the employee handbook

9. Reporting Concerns

Employees and third parties may report concerns through:

- Their line manager.

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- Direct to HR
- The CFO.
- The confidential Your Voice channel on HiBob.

All reports will be investigated promptly, sensitively, and without retaliation. Where criminal activity is suspected, Celebrus may notify law enforcement.

10. Recruitment Practices

Celebrus maintains fair and transparent recruitment processes, including:

- Verifying identity and right to work documentation.
- Prohibiting recruitment fees.
- Ensuring that all employment contracts meet legal and ethical standards.

Recruitment agencies must confirm compliance with labour standards.

11. Monitoring and Review

This policy will be reviewed annually by the CFO and approved by the Board or Audit & Risk Committee. Progress and key actions will be summarised in the Company's annual Modern Slavery Statement.

12. Breach of This Policy

Any employee found to be in breach of this policy may face disciplinary action up to and including termination. Suppliers found to be in breach may face contract termination and reporting to relevant authorities.

Approved by: The Board of Directors, Celebrus Technologies plc

Next Review Date: November 2026