

Slavery and Human Trafficking Policy and Statement 2018

Aims of this policy

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, and any other third party representative.

We expect all who have, or seek to have a business relationship with Entanet International Limited (“Entanet”) to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy.

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

What do we mean by modern slavery?

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

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All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

How do I spot the signs of slavery?

Someone in slavery might:

- appear to be in the control of someone else and reluctant to interact with others;
- not have personal identification on them;
- have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work;
- not be able to move around freely;
- be reluctant to talk to strangers or the authorities;
- appear frightened, withdrawn, or show signs of physical or psychological abuse;
- dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.

If you think someone is in immediate danger, please call the police on 999. In order to protect the potential victim, do not attempt to inform them of your actions.

If you think someone is a potential victim but there is no immediate threat to life, please call the local police on 101.

You can also call the Modern Slavery Helpline on 0800 0121 700 24 hours a day.

How we seek to embed our anti-slavery policy in practice

To underpin our policy commitments, we are in the process of implementing the following measures over the course of the financial year 2018 :

- We have conducted risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery.
- Where appropriate, as informed by our risk assessment, we will engage directly with new suppliers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses and supply chains.

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- Our contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour in line with this policy. We also make provision for our contracted suppliers to hold their own suppliers to the same standards.

Responsibility for this policy

The board of directors has overall responsibility for this policy and in ensuring that Entanet complies with all its legal and ethical obligations.

The Chief Executive Officer will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All senior managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

Communication and employee awareness training

The Head of Products will ensure that relevant staff receive adequate training on this policy and any supporting processes applicable to their role.

In addition staff will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and the identify individuals/areas of the business that may be at risk from practices of modern slavery.

Breaches of this policy

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee, director or officer of Entanet may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to who whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

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If any part of this policy is unclear, clarification should be sought from the Head of Products.

Status of this policy

This Anti-slavery policy will be reviewed by Entanet's senior management team at least annually.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

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