

Anti-Slavery Policy

1. Introduction

1.1. This policy sets out INA Prime Solutions' expectations and commitments in accordance with the Modern Slavery Act 2015.

1.2. INA has zero tolerance for slavery and human trafficking in any part of our business, including our supply chains. We have a number of policies in place to ensure all our employees have the right to work and are paid fairly, that we act with integrity and ethically, and that we have effective measures in place to ensure slavery is not present anywhere in our business or supply chain.

1.3. This includes our Equal Opportunities policy, which encompasses recruitment, promotion, training, performance management and reward. Our principles of fair treatment and respect are also applied to our relationships with our customers and our suppliers

2. Policy statement

2.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

2.2. INA is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2.3. This policy applies to all persons working for INA or on our behalf in any capacity, including employees at all levels, directors, senior management, full-time staff, part-time staff, interns, external consultants, third-party representatives and business partners.

2.4. This policy does not form part of any INA employee contract of employment and INA may amend it at any time.

3. Responsibility for the policy

3.1. The Management Board has overall responsibility for ensuring this policy complies with INA's legal and ethical obligations, and that all those under our control comply with it.

3.2. INA's Human Resources Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.3. INA management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

4. Compliance with the policy

4.1. All INA employees must read, understand and comply with this policy.

4.2. The prevention, detection and reporting of modern slavery in any part of INA's business or supply chains is the responsibility of all INA employees. INA employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3. INA employees must notify the Human Resources Manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

4.4. INA employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of INA's business or the supply chains of any supplier tier at the earliest possible stage.

4.5. If an INA employee believes or suspects a breach of this policy has occurred or that it may occur they must notify the Human Resources Manager as soon as possible.

4.6. If an INA employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of INA's supply chains constitutes any of the various forms of modern slavery, they must bring it to the attention of the Human Resources Manager.

4.7. INA encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. INA is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of INA's own business or in any of INA's supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If a INA employee

believes they have suffered any such treatment, they need to inform the Human Resources Manager immediately.

5. Communication and awareness of this policy

5.1. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for INA, and regular training will be provided as necessary.

5.2. INA's commitment to addressing the issue of modern slavery must be communicated to all suppliers and business partners at the outset of establishing a business relationship with them and reinforced as appropriate thereafter.

6. Breaches of this policy

6.1. Any INA employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2. INA may terminate the relationship with other individuals and organizations working on INA's behalf if they breach this policy.

Review and update of this document will take place when changes require revising the **Anti-Slavery Policy**. Such modifications may relate to changes in roles and responsibilities, release of new legislation or the identification of a new policy area, in consultation with appropriate members and their approval on all revisions to this Anti-Slavery Policy. When approved a new version of the policy will be issued and all affected departments will be informed of the changes.