

Modern Slavery Policy

Policy statement

Modern slavery is a crime and a fundamental violation of human rights. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

Practicus Ltd (“Company”) has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all business dealings. The Company is committed to implementing and enforcing effective systems and controls to ensure that modern slavery isn’t taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company expects the same high standards from all suppliers, contractors and other business partners and requires them to uphold these standards in their own supply chains.

To be clear, this policy applies to all individuals working for the Company or on the Company’s behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors or consultants.

This policy is reviewed annually and updated as necessary.

1 Responsibility for the policy

- 1.1 The Board of Directors has overall responsibility for ensuring that this policy complies with the Company’s legal and ethical obligations, and that it is implemented effectively.
- 1.2 The Head of Business Support has day-to-day responsibility for implementing this policy, monitoring and reviewing internal controls and related policies and procedures to ensure they are effective. They are also responsible for investigating allegations of modern slavery in the Company’s business or supply chains and coordinating remediation.
- 1.3 Line managers are responsible for ensuring team awareness and compliance with the policy, and escalating concerns promptly.
- 1.4 All other individuals, as identified above, are responsible for remaining vigilant to modern slavery risks and reporting concerns promptly.

2 Risk Assessment

- 2.1 The Company adopts a risk-based approach to identifying and addressing modern slavery risks. These risks include, but are not limited to:
 - Suppliers operating in higher risk sectors
 - Suppliers operating in higher risk geographies
 - Rapid onboarding of new suppliers without due diligence
- 2.2 Risk assessments are conducted during supplier onboarding, periodically for existing suppliers and as and when the Company may expand into new geographies or business activities.
- 2.3 Where risks are identified the Company will escalate concerns internally and work with the supplier to remediate where it can.

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3 Supplier standards

- 3.1 The Company expects all suppliers to prohibit all forms of modern slavery and subscribe to the core principles of providing safe working conditions, fair pay and hours, treating workers with dignity and respect, ensuring employment is freely chosen and allowing freedom of movement.

4 Reporting concerns

- 4.1 Concerns should be raised with a line manager, the Head of Business Support or via the Company's whistleblowing policy.
- 4.2 All concerns will be treated with strict confidence and taken seriously.
- 4.3 External guidance is available from <https://www.modernslaveryhelpline.org/>

5 Training and awareness

- 5.1 The Company provides this policy to all its employees, be they employed or a contractor, upon joining the organisation.
- 5.2 Further training is mandatory for those in procurement, HR and supplier management.
- 5.3 The policy is available on the Company website and is shared with all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

6 Breach of policy

- 6.1 Any employee who breaches this policy will face disciplinary action, up to and including dismissal for gross misconduct.
- 6.2 The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Signed:



Sam Hawkins
CEO
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