

ANTI-SLAVERY POLICY

Introduction

The policy applies to all persons working for or on behalf of Castor & Pollux Consulting LLP ('the Company'), in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

The Company expects all who have, or seek to have, a business relationship shall familiarise themselves with this policy and to act in a way that is consistent with its values.

The Company will only do business with organizations who fully comply with this policy, or those who are taking verifiable steps towards compliance.

About the Policy

The Company is committed to ensure that the organization and its supply chain are free from modern slavery or human trafficking in any form. These practices focus on anti-slavery and anti-human trafficking and are part of a larger effort to ensure transparency, accountability and safeguarding of human rights extended to its supply chain.

The Company expects all those who work with and for it including without limitation, its personnel, supply chain and contractors, to read and comply with this policy.

Responsibility for this Policy

The Executive Board has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations. The Managing Director and CEO 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.

What do we mean by Slavery?

Slavery can take many forms; it is a complex and multi-faceted problem

- 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



- Child labour which is illegal and it involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of 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.

How the Company seeks to Embed the Anti-Slavery Policy in Practice?

To underpin the commitments laid out in this policy, the Company aims to implement the following measures:

- a) The Company will conduct risk assessments to determine which parts of the business and which supply chains are most at risk from slavery so efforts can be focused on the areas that are most 'at risk'.
- b) Where appropriate, as informed by the risk assessment, the Company will engage directly with new suppliers in respect of the Anti-Slavery Policy in order to gain a proper understanding of the measures they have in place to ensure that slavery is not occurring within their own businesses.
- c) Our contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy

We also make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy

Communication and employee awareness training

Managers will ensure that relevant colleagues receive adequate training on this policy and any supporting processes applicable to their role.

Due diligence processes against slavery

As part of its initiative to identify and eliminate any slavery, the Company –

- strives to build long standing relationships with local suppliers and customers to effectively communicate its business standards;
- employs whistleblowing and grievance redressal systems to encourage reporting of concerns and/or violations;
- conducts independent assessments through third party tools and review the reports internally prior to the on-boarding of any vendor/partner, whenever considered necessary.



Breaches of this policy

The breach of this policy by an employee, director or officer of the Company may lead to disciplinary action being taken in accordance with the Company's Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

All colleagues 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.

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

Display & communication of policy



- a) The Policy shall be displayed to all employees through intranet portal of the Company.
- b) Any changes in the Policy shall be notified through the intranet portal by way of updated Policy document.
- c) Policy Awareness shall be conducted regularly through various discussion /communication forums.

Periodic Review and Evaluation

Our Board of Directors will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness.

Our Company reserves the right to vary and/or amend the terms of this Policy from time to time.

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