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MODERN SLAVERY POLICY

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1. Purpose

The purpose of this policy is to communicate and establish controls to ensure compliance with all Anti-slavery and Human trafficking regulations as well as ensuring alignment to the organisation's ethical standards.

2. What is Modern Slavery?

Modern Slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, servitude, forced compulsory labour, bonded and child labour and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

There is no typical victim of Modern Slavery, and some victims do not understand that they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of Modern Slavery or human trafficking:

- The person is not in possession of their own passport, identification or travel documents;
- The person is acting as though they are being instructed or coached by someone else;
- The person allows others to speak for them when spoken to directly;
- The person is dropped off and collected from work;
- The person avoids eye contact, is withdrawn or appears frightened;
- The person does not seem to be able to contact friends or family freely;
- The person has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

3. Commitment

We have a responsibility both as a business and as individuals to tackle any form of Modern Slavery.

We will not tolerate, facilitate or condone any form of Modern Slavery across our business or throughout our supply chains and partnership networks. This is supported through the communication to, and compliance of, our employees, suppliers and third-party providers with the Createch Solutions Modern Slavery Policy.

4. Our Policy

Our policy does not allow for any form of slavery or human trafficking and we will take proactive steps to ensure that Modern Slavery is not taking place in any part of our business or supply

chains. We will not engage with organisations which facilitate any form of slavery including the use of child labour or forced labour, or which do not recognise freedom of association or collective bargaining.

We expect that the suppliers and third-parties we work with should hold their own suppliers and third parties to the same standards. We seek to continually improve awareness of the practices necessary to combat slavery and human trafficking and assess the risk profile of our business in these areas.

Our zero-tolerance approach to Modern Slavery includes our commitment that:

- we will not allow any form of slavery or human trafficking to take place in any part of our business;
- we will not use child labour, nor will we use forced labour;
- we recognise freedom of association by permitting our employees to establish and join organisations of their own choosing without our permission;
- we will recognise collective bargaining where required by local laws;
- we will comply with all relevant laws, statutes and regulations relating to modern slavery;
- we require our suppliers and third-party providers to comply with the above; and to hold their own suppliers and third-parties to the same standards;
- we will seek to educate and raise awareness across our business in the identification and reporting of Modern Slavery.

5. Compliance

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all those working within it. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, interns, agents, contractors, external consultants, third party representatives, business partners and suppliers.

We expect the highest standards of compliance to be upheld at all times.

We have a robust governance structure in place and take a risk-based approach to our contracting processes which are then kept under review. We retain the right to audit our supplier's activities and where practical, relationships, both routinely and at times of any reasonable suspicion. If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. If a supplier or third-party provider is found to be in breach of this policy, we may terminate our relationship and any contract or purchasing agreement in place.

6. Reporting Modern Slavery

Employees, suppliers and third-party providers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy. If you are an employee, you must report any incidence or suspicion of Modern Slavery and/or human trafficking in any part of our business or supply chain to your Line Manager, or the CEO.

If you are a supplier, business partner or third-party provider to Createch Solutions, you should report any suspicion to your primary account manager or business contact with the Createch Solutions.

7. Application

The policy covers all company employees, suppliers and third-party providers and is intended to ensure all are aware of the responsibilities they hold. We also have several policies, and statements relevant to Modern Slavery which should be read in conjunction with and supplement this policy (such as our Whistleblowing Policy).

8. Accessibility and awareness.

CREATECH Solutions will ensure all employees are informed about this policy, legislative changes, how to make a disclosure about the issues they are concerned with, and the steps involved, in accordance with this policy. This information will be provided through a variety of platforms including CREATECH Solutions' intranet and upon induction to CREATECH Solutions and through other training.

9. Agreement & administration

Our Board of Directors has overall accountability for ensuring that this policy complies with our legal and ethical obligations, and that all our people comply with it. The CEO is responsible for the policy implementation and appropriate communication of this policy to all relevant employees together with associated training programmes.

This policy will be reviewed every two years or as required in accordance with any updates to relevant legislation.

Signed for and on behalf of CREATECH SOLUTIONS, S.L.

Albert Vilardaga
CEO



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