



Anti-Slavery and Anti-Trafficking Policy

Introduction

Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as enacted in the Modern Slavery Act 2015 ('the Act'). Curation is committed to a zero-tolerance approach to modern slavery and to acting with integrity in all its dealings, relationships, and supply chains. It expects the same high standards from all its staff, suppliers, contractors, and those with whom it does business. This policy applies to all employees, workers, consultants, and other persons doing business with Curation including all its wholly owned companies, contractors, and suppliers.

Curation acknowledges the risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour. Although Curation considers the risk of modern slavery to be low due to the nature of its relatively small supply chains, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following policy measures:

- The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for Curation or under its control.
- Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).
- All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited.
- Curation encourages anyone to raise any concerns about modern slavery and will support anyone who acts in good faith. Anyone can raise a concern by contacting a member of the Curation management team.
- Wherever possible, Curation will obtain warranties from suppliers that they are free of modern slavery (which can be passed on to subcontractors). These warranty clauses are contained in our standard procurement contracts and purchase order terms and conditions.
- Curation also has an equal opportunities and diversity policy and is committed to upholding human rights.



- Curation will continue to develop its commitment to combat modern slavery and will provide staff training where appropriate.

Any breaches of this policy may result in Curation taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.

Where we receive goods or services (to be inserted in all procurement contracts)

"The Contractor acknowledges that as an organization carrying out business in the UK it is required to comply with the Modern Slavery Act 2015. The Contractor warrants that it does so and will take steps to ensure its operations and supply chains are trafficking- and slavery-free, including without limitation imposing substantially similar obligations to those in this clause where it is permitted to subcontract its obligations under this Agreement so that multi-level supply chains are addressed. The Contractor acknowledges and agrees that any breach of this warranty will constitute a material remediable breach of contract.

The Contractor further warrants that neither it nor any of its officers, employees, nor so far as it is aware any subcontractor or other persons associated with it, have been convicted of any offence involving slavery and human trafficking. The Contractor acknowledges and agrees that any breach of this warranty will constitute an irremediable breach of contract"

Where we provide goods or services Curation acknowledges that it is an organization carrying out business in the UK. It is required to comply with the Modern Slavery Act 2015 and that pursuant to Section 54 of that Act it will publish annually the steps it is taking to ensure its operations and supply chains are trafficking- and slavery-free.

The Chief Operating Officer will have primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and if necessary are given adequate training on it.

Sandy Jayaraj

Director

Date : 1 September 2020