

Anti-Slavery and Human Trafficking Policy

Proptivity UK Ltd

Adopted: 19 August 2025

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Anti-Slavery and Human Trafficking Policy

1. Policy Statement

Proptivity UK Ltd is committed to preventing modern slavery and human trafficking in all aspects of its operations and supply chains. We adopt a zero-tolerance approach and expect the same standards from all our contractors, suppliers, and business partners.

2. Scope

This policy applies to:

- All employees, directors, and officers of Proptivity UK Ltd.
- All subcontractors and suppliers involved in the procurement, installation, maintenance, and support of systems in UK commercial properties.

3. Legal Compliance

We comply with Section 54 of the **Modern Slavery Act 2015**, and will:

- Publish an annual **Modern Slavery Statement** if our turnover exceeds £36 million.
- Review and update this policy regularly or as required by regulatory change.

4. Responsibilities

- The Board of Directors is responsible for approving this policy.
- The UK Management team are responsible for implementing due diligence and monitoring compliance within Operations and Procurement).

5. Key Commitments

We will:

- Avoid engaging with suppliers or subcontractors known to be involved in slavery or human trafficking.
- Include anti-slavery clauses in contracts with subcontractors and suppliers.
- Provide basic training to staff on identifying and reporting modern slavery risks.
- Maintain a whistleblowing mechanism for reporting concerns.

6. Risk Assessment and Due Diligence

We will:

- Conduct basic risk assessments of our supply chain, focusing on subcontracted services and imported systems.
- Require suppliers to confirm compliance with anti-slavery laws.

7. Reporting and Transparency

- Our Modern Slavery Statement will be published on our website and submitted to the UK government registry (if applicable).
- We will disclose any identified risks or incidents and actions taken.

Approved by:

Proptivity UK Ltd Board, 19 August 2025