

# Modern Slavery Policy

## 1. Purpose

Crownpeak Technology Inc. is committed to ensuring that modern slavery and human trafficking do not occur within our business operations or supply chains. This policy outlines our approach to identifying, preventing, and mitigating risks of modern slavery in compliance with applicable laws, including the UK Modern Slavery Act 2015 and other relevant regulations.

## 2. Scope

This policy applies to all employees, contractors, suppliers, and business partners of Crownpeak Technology Inc., regardless of location.

## 3. Our Commitment

- We have zero tolerance for modern slavery, forced labor, human trafficking, or exploitation in any form.
- We are committed to acting ethically and with integrity in all our business dealings.
- We will implement and enforce effective systems and controls to ensure modern slavery does not occur in our supply chains or operations.

## 4. Due Diligence and Risk Assessment

To uphold this commitment, we will:

- Conduct risk assessments of our supply chains to identify areas of potential exposure to modern slavery.
- Require suppliers and contractors to confirm compliance with anti-slavery laws.
- Monitor and audit high-risk suppliers periodically.

## 5. Training and Awareness

We will provide training to employees and key stakeholders to ensure they understand the risks of modern slavery and how to report concerns.

## 6. Reporting Concerns

Employees, suppliers, and third parties are encouraged to report any concerns about modern slavery or human trafficking. Reports can be made confidentially via [Privacy@crownpeak.com](mailto:Privacy@crownpeak.com).

## 7. Accountability and Governance

The Board of Directors is responsible for overseeing the implementation of this policy. Regular reviews will be conducted to ensure its effectiveness.

## 8. Continuous Improvement

We are committed to continuously improving our practices to combat modern slavery. This includes updating our policies, procedures, and training programs as necessary.

## 9. Compliance

Failure to comply with this policy may result in disciplinary action, termination of contracts, or other appropriate measures.



## **10. Policy Review**

This policy will be reviewed annually and updated as required to reflect changes in legislation or business practices. (last reviewed December 2024)