

2.2.6 Anti-Slavery Policy

2.2.6.1 Application and Scope of this Policy

This policy statement applies to all Spaceframe's business operations and associated subcontractors and suppliers within Spaceframe's supply chain.

2.2.6.2 Commitment

Slavery, including any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power, or deception, and human trafficking, is abhorrent and Spaceframe is committed to ensuring that it is absent from Spaceframe's business and its supply chain. Spaceframe's respect for human rights refers to internationally recognised human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. To demonstrate its commitment to anti-slavery, Spaceframe shall:

- seek to identify and risk mitigate any adverse human rights impacts that Spaceframe may cause or contribute to through its own business activities, or which may be directly linked to its operations by its business relationships;
- avoid causing or contributing to adverse human rights impacts through its own business activities, and address such impacts when they occur;
- seek to prevent, or mitigate, adverse human rights impacts that are directly linked to Spaceframe's design and construction operations and by its business relationships, even if they may not have knowingly contributed to those adverse impacts;
- exercise a due diligence process to identify, prevent, mitigate and account for how Spaceframe addresses possible impacts on modern slavery and human rights; and
- exercise management system processes to enable the remediation of any adverse human rights impacts to which Spaceframe, or its subcontractors and suppliers may contribute.

2.2.6.3 Statement of Risk Appetite

Spaceframe has a zero tolerance of slavery in all its forms. This means that Spaceframe has no appetite for causing harm to persons, damaging its reputation, being subject of legal action or incurring financial loss or standing in the business community arising from a failure to comply with the Law set out in the Modern Slavery Act. Spaceframe's policies, management system processes, procedures, controls and risk mitigation strategies are designed to reduce the risk and the prevalence of modern slavery.

2.2.6.4 How Spaceframe Combats Slavery

In order to combat slavery, Spaceframe has taken the following steps to demonstrate compliance with the Modern Slavery Act:

- Spaceframe Directors and Senior Management have performed a risk assessment to identify those parts of the business operations and supply chain where there may be a risk of modern slavery taking place. The risk assessment will be performed annually and the outputs and actions will be reviewed by Spaceframe's Board of Directors. Spaceframe considers itself to be at "low" risk of slavery arising (meaning that it is either unlikely, or known, that slavery is not occurring), but Spaceframe is not complacent and as a result of the risk assessment has identified sensible, risk based measures to reduce identified risk to within the Boards stated level of risk appetite.
- Persons employed by Spaceframe have a formal contract of employment, to reduce risk of forced labour occurring. Failure to act in accordance with this Anti-Slavery Policy may result in disciplinary action being taken.
- Spaceframe has implemented and identified further checks in supply chain (principally those involved in providing subcontracted services and supply of construction related goods and services to Spaceframe)

to reduce the risk of slavery occurring. Further actions have been identified that will, when implemented, require participants in the supply chain to attest to an absence of non-compliant activity; to sign contracts/agreements that require compliant behaviour and to report slavery related issues/non-compliances to Spaceframe, and Spaceframe shall carry out remedial steps where modern slavery is identified.

- Spaceframe will provide training for staff on modern slavery risks and impacts.
- Spaceframe shall publish this Anti-Slavery Policy statement on its website (for subcontractor and supplier access/reference when tendering), as a means of communicating Spaceframe's due diligence processes and commitment in relation Modern Slavery Act compliance.
- Spaceframe stipulates anti-slavery and human rights expectations to staff, business partners and other parties directly linked to Spaceframe's operations.
- Spaceframe shall ensure that this Anti-Slavery Policy is available and communicated internally and externally to all personnel, business partners and other relevant parties and is reflected in operational policies and procedures necessary to embed it throughout the business.
- Spaceframe will formally review performance against this policy annually.



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