

Anti-Slavery and Human Trafficking Policy

Cirkularis8 Ltd sets out the minimum behaviours we expect from our employees, sub-contractors and supply chain partners within our policies and procedures. This policy deals with the specific issues associated with modern slavery and human trafficking.

This policy applies to all persons working for or on our behalf of Cirkularis8 in any capacity, including employees, sub-contractors and suppliers.

Cirkularis8 strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our customers and clients will hold their own suppliers to the same high standards.

Modern Slavery and Human Trafficking

Modern slavery is a crime and a violation of an individual's fundamental human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our company has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in within the businesses or in any of our supply chains.

Commitments

Cirkularis8 Ltd expects everyone working with us or on our behalf of the company, to support and uphold the following measures in place to safeguard against modern slavery:

- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf;
- Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, breach of this policy;
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain;
- We take a risk-based approach to our contracting processes and keep them under review;
- We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our policies, which set out the minimum standards required to combat modern slavery and trafficking.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our policies and procedures.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Who is responsible for the policy?

The Founder has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Founder has 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 are given adequate and regular training on it.

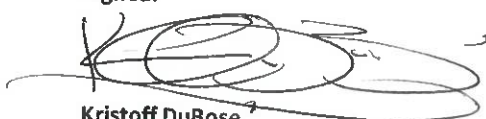
Monitoring and Review

The Contracts Director will monitor the effectiveness and review the implementation of this Policy on an annual basis considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

Individuals working for or on behalf of Cirkularis8 are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Operations Director.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

Signed:

A handwritten signature in black ink, appearing to be 'Kristoff DuBose', written over a horizontal line.

Kristoff DuBose
Founder

Date: 01.07.2019