

## Change History

Version 1.0:	Drafted & approved Niall Riddell	16 <sup>th</sup> May 2022
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## Introduction

A key purpose of the Modern Slavery Act is to prevent modern slavery in organisations and their supply chains. A means to achieve this is to increase transparency by ensuring the public, consumers, employees and investors know what steps an organisation is taking to tackle modern slavery.

## Our Policy

Paua Tech Limited's business is the provision and support of a SaaS application enabling business with electric vehicles to more easily use public electric vehicle charging. We are committed to upholding the human rights of all employees, treating them with dignity and respect and complying with all applicable laws and regulations. This includes the prevention of human trafficking and slavery.

We have 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 our own business. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Paua.

## Operation

### Modern Slavery Act

Section 54 of the Modern Slavery Act 2015 requires organisations with significant turnover to develop a slavery and human trafficking statement each year. Paua's slavery and human trafficking statement highlights what steps have taken to ensure modern slavery is not taking place in our business or supply chains. The following indicators outline Paua's compliance with the requirements.

### Our Commitment

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- Paua Employee's must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- Further employee's are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or that it may occur please notify Paua as soon as possible.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with us.
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- We shall train managers and all other employees to implement our policies and ensure we meet applicable legal requirements. This will involve the prevention of human trafficking and slavery. This enables employees to recognise and respond to any instances of modern slavery, during work time or otherwise.
- We shall carry out internal reviews of suppliers and by taking a risk assessment approach we can identify and understand the potential risks and so ensure we can respond appropriately to any challenges.
- Reviews of all contracts and terms of business are completed and should include provisions to ensure we have the right to terminate any supplier contracts where modern slavery legislation has not been adhered to.
- Paua will not knowingly use child labour or forced labour in any of our services or accept services from suppliers that are not taking similar steps to combat such unlawful practices.

## **Incident Management**

Modern slavery and human trafficking are serious offences. If a specific case of modern slavery is identified, during working hours or otherwise, it should be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number should be used.

The above steps will be completed in accordance with Paua's Incident Management Policy.

In the UK, mechanisms are in place to assist victims of slavery and human trafficking. A potential victim can be referred to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered Government support. Referral for potential adult victims is by consent.

The Modern Slavery Helpline on 0800 0121 700 will allow anyone who thinks they may have come across an instance of modern slavery, or indeed who may be a victim themselves, to call for more information and guidance on what to do next.

## **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **Review**

This policy is reviewed annually as part of the Paua's management systems reviews to ensure the Modern Slavery statement remains relevant and appropriate.

## **Agreement and Approval**

### **Employees**

Hicomply will ensure that all permanent and temporary staff, as a condition of employment, are aware of their responsibility to comply with the provisions of the business, as defined in the appropriate management and security policies and procedures forming the company Integration Management System (IMS).

### **Management commitment for human rights and social responsibility within Paua**

The senior management team has endorsed this Policy for its technical and legislative compliance, and it has been approved by the Paua directors and the senior management team.