



# Anti-Bribery & Modern Slavery Policy



## Version 1.1

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Carbon Footprint Ltd is committed to responsible corporate behaviour, complying with all laws and regulations, and upholding strong ethical standards in our business practices. This includes a firm stance against corruption, bribery, forced labour, and modern slavery.

## Anti-Bribery Commitment

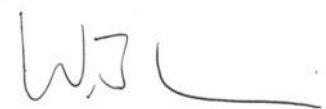
Carbon Footprint is fully committed to instilling a strong anti-corruption culture and to compliance with all anti-bribery and anti-corruption legislation, including, but not limited to, the Bribery Act 2010. We ensure that no bribes or other corrupt payments, inducements, or similar are made, offered, sought, or obtained by us or anyone working on our behalf.

## Modern Slavery Mitigation Steps

Although our turnover is below the statutory compliance trigger point of £36m under the Modern Slavery Act 2015, Carbon Footprint Ltd is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. To mitigate the risk of exposure and to work towards ending modern slavery, we have implemented the following measures:

- 1. Business Conduct Guidelines:** Our Business Conduct Guidelines outline our expectations for ethical behaviour, including the prohibition of forced labour, human trafficking, and any form of modern slavery. All employees are required to adhere to these guidelines.
- 2. Supply Chain Code of Conduct:** We have established a Supply Chain Code of Conduct that sets forth our requirements for suppliers regarding labour practices, human rights, health and safety, environmental sustainability, and business ethics. Suppliers are expected to comply with this code and to ensure their own supply chains are free from modern slavery.
- 3. Supplier On-Boarding Process:** As part of our supplier on-boarding process, we conduct due diligence to assess potential risks, including those related to modern slavery. This may include background checks, site visits, and the review of relevant policies and procedures.
- 4. Training:** We provide training to our staff, in roles such as procurement and supply chain management, on identifying and preventing modern slavery.
- 5. Reporting Mechanisms:** We have established reporting mechanisms for employees, suppliers, and other stakeholders to raise concerns about modern slavery or other unethical practices. All reports are investigated and addressed promptly.

We recognise that mitigating the risk of modern slavery is an ongoing process, and we are committed to continuously improving our practices and working collaboratively with our suppliers and other stakeholders to combat this global issue.

A handwritten signature in black ink, appearing to read "WJL", written over a light blue horizontal line.

Dr. Wendy Buckley  
(Client Director, Carbon Footprint Ltd)