



ACT

Modern Slavery Policy

Version 1

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1. Introduction

Sustainable Market Solutions Holding B.V., and affiliated companies worldwide (hereinafter “ACT” or “the company”), is committed to the highest ethical standards. It ensures all its activities are conducted in accordance with the relevant regulations, policies, procedures, standards, and codes of conduct the company has adopted.

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

ACT combats Modern slavery in any form, and complies with all related legislation, regulation, and standards where it operates (e.g. The UK's Modern Slavery Act 2015). We seek to continuously improve our practices to combat slavery more effectively.

2. How is modern slavery approached by ACT?

ACT has a zero-tolerance approach to modern slavery and is committed to act ethically in all its business dealings and relationships and to implement effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

Management will assess any notification, committing to further action where needed and to report to the relevant authorities where applicable.

ACT is also committed to transparency in its own business and in its approach to tackling modern slavery throughout its supply chains. ACT will disclose a Policy Statement upon the publication of this policy and will train ACT employees accordingly.

ACT expects the same high standards from all its clients, suppliers, and other business partners, and expects all organizations (and individuals) it has any dealing with to hold their own suppliers to the same high standards.

This policy applies to all persons working for ACT or on its 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.

This policy does not form part of any employee's contract of employment and the company may amend it at any time.

3. Responsibility for the policy

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

The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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 today's business world.

All employees 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 the ESG Director.

4. Compliance with the policy

The prevention, detection, and reporting of modern slavery in any part of ACT's business or supply chains is the responsibility of all those working for ACT or within any organization it works with (for example, a professional service provider to another third-party facilities provider).

Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. All employees are encouraged to raise concerns at the earliest possible stage about any issue or suspicion of modern slavery in any parts of the company's business or the supply chains of any client, counterparty, or supplier.

If ACT employees believe or suspect a breach of this policy has occurred or that it may occur, they must notify the line manager or Compliance Officer or report it in accordance with our Speak Up Policy as soon as possible.

ACT aims 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. The company is committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of ACT's own business or in any of its supply chains or counterparts. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If an employee believes they have suffered any such treatment, they should inform their line manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If the matter is not remedied the employee should discuss the matter in confidence with the Compliance Officer.

5. Communication & awareness of this policy

Training on this policy, and on the risk ACT's business faces from modern slavery in its business dealings, forms part of the induction process for all individuals who work for the company, and updates will be provided using established methods of communication.

ACT's zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners.

6. Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. ACT may terminate its relationship with other individuals and organizations working on the company's behalf if they breach this policy.