



Modern Slavery Policy

**POL31-1**

Codex is committed to acting in a responsible and ethical manner whilst conducting its business. We have a zero-tolerance approach to modern slavery. We take responsibility for conducting and growing our business in a sustainable and responsible manner very seriously.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Modern slavery refers to the offences of human trafficking, slavery, servitude, and forced or compulsory labour. This can then be considered under five headings:

- the sexual exploitation of adults;
- the trafficking of adults into conditions of labour exploitation;
- the trafficking of adults into conditions of criminal exploitation;
- the trafficking of minors into conditions of sexual, criminal or labour exploitation;
- other forms of exploitation

Codex prohibits the practice of modern slavery in all company operations and within our global supply chains.

Codex's prohibition on modern slavery applies to all people working for the Company or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, suppliers and their supply chains, third-party representatives and business partners.

Codex will promptly and thoroughly investigate any claim or indication that a supplier is engaging, directly or indirectly, in human trafficking or slavery.

As part of our supply chain accreditation process, we include our Modern Slavery Policy in our contracting processes to ensure our supply chain are aligned against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and conduct a due diligence process with all potential contractors. We assess our suppliers across a number of key risk areas, at the on-boarding stage and annually thereafter for key suppliers.

Codex will not work with any suppliers who have demonstrably and repeatedly failed to comply with basic International Labour Organization (ILO) standards.

If a supplier is found in violation of this policy, Codex will take remedial measures to address the violation.

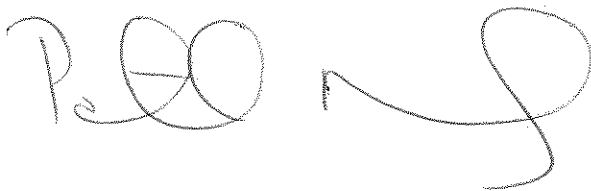
We protect anyone who brings concerns about modern slavery to our attention.

Our procurement and tender process is in place to ensure that all suppliers meet our expectations of good human rights practices and general business ethics in the wider sense, and to help identify opportunities to reduce the risk of forced labour within our supply chain.

Furthermore, Codex's existing policies help ensure the compliance with relevant law and ethical responsibilities. Those policies include:

- Recruitment Policy
- Vetting Policy and Procedures
- Equal Opportunities Policy
- Dignity at Work Policy
- Anti-Bribery and Corruption Policy
- Protected Disclosure Policy (Whistleblowing)
- Employee Code of Conduct
- Corporate Social Responsibility Policy

The CEO of Codex is accountable for ensuring all assessment processes are carried out thoroughly. The CEO is also responsible for providing adequate resources such as training and investment to ensure suppliers, employees, agents and representatives are compliant with this policy.

A handwritten signature in black ink, appearing to read 'P. Murphy', with a stylized flourish at the end.

Patrick Murphy  
CEO  
May 2022