

# Connexion Developments Ltd

## Modern slavery and human trafficking policy

### 1. Policy Statement

Connexion Developments Ltd is committed to upholding the highest standards of ethics and integrity in all aspects of our business operations. Modern slavery, in all its forms—including slavery, servitude, forced labour, and human trafficking—is a serious crime and a violation of fundamental human rights. We have a zero-tolerance approach to modern slavery and are dedicated to implementing and maintaining robust systems and controls to prevent its occurrence within our operations and supply chains.

We are committed to ensuring transparency in our business practices and in our efforts to combat modern slavery across our supply chain. This commitment aligns with our obligations under the Modern Slavery Act 2015. We expect our contractors, suppliers, and business partners to adhere to the same high standards, and our standard contractual agreements explicitly prohibit any use of forced, compulsory, or trafficked labour. We also expect our suppliers to enforce these principles within their own supply chains.

This policy applies to all individuals working for or on behalf of Connexion Developments Ltd, including but not limited to directors, officers, senior managers, employees (permanent, fixed-term, or temporary), agency workers, secondees, consultants, contractors, third-party representatives, business partners, and any other persons associated with our organization, regardless of their location.

### 2. Responsibilities

#### Company Leadership

The Directors of Connexion Developments Ltd hold ultimate responsibility for ensuring compliance with this policy, including monitoring its effectiveness, maintaining necessary records, and addressing any concerns or incidents related to modern slavery.

#### Management

Managers at all levels are responsible for ensuring that employees and contractors under their supervision understand and comply with this policy. They must also ensure that appropriate training is provided where necessary.

#### Employees and Workers

All employees and individuals working under our control are responsible for upholding this policy. This includes:

- Reading, understanding, and complying with the policy.
- Preventing, detecting, and reporting any suspected cases of modern slavery within our business or supply chains.
- Avoiding any activities that could lead to a breach of this policy.

### 3. Reporting and Compliance

We encourage all employees, contractors, and business partners to report concerns or suspicions of modern slavery at the earliest opportunity. Any concerns should be directed to a company director. If there is uncertainty regarding whether an action or condition constitutes modern slavery, employees should seek guidance immediately.

We are committed to fostering a culture of openness and will protect any individual who raises concerns in good faith. No one reporting genuine concerns will face retaliation, including dismissal, disciplinary action, or any form of disadvantageous treatment. Any individual who believes they have been subjected to such treatment should report it immediately to the Managing Director.

### 4. Communication and Awareness

Our zero-tolerance stance on modern slavery will be clearly communicated to all suppliers, contractors, and business partners at the outset of our relationship and reinforced, as necessary.

### 5. Consequences of Non-Compliance

- Employees found to be in violation of this policy will be subject to disciplinary action, up to and including dismissal for misconduct or gross misconduct.
- Connexion Developments Ltd reserves the right to terminate relationships with individuals or organizations that fail to comply with this policy.
- This policy does not form part of any employment contract and may be amended, as necessary.

### 6. Policy Review

This policy will be reviewed periodically to ensure its effectiveness and compliance with evolving legal and ethical standards.

Signed: *Michael G Freye* Managing Director

Print name: Michael G Freye

Dated: 11<sup>th</sup> March 2025