

## **Anti-Slavery & Human Trafficking Policy**

### **1. POLICY STATEMENT**

1.1 Modern slavery is a criminal violation of fundamental human rights. It manifests in various forms such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which involve depriving a person's liberty to exploit them for personal or commercial gain.

1.2 Project CÜRV, a trading name of CURV360 Ltd. adopts a zero-tolerance stance on modern slavery, in alignment with the policies set by its parent company, Project Better Energy Ltd.

1.3 This policy applies to all individuals working for or on behalf of Project CÜRV, a trading name of CURV360 Ltd., encompassing employees at all levels, directors, agency workers, volunteers, external consultants, third-party representatives, and suppliers. It also extends to all affiliated and subsidiary companies within the Project CÜRV, a trading name of CURV360 Ltd. group, ensuring that they uphold equivalent standards and implement robust controls to prevent modern slavery and human trafficking within their operations, in accordance with the wider policies of Project Better Energy Ltd.

1.4 Project CÜRV, a trading name of CURV360 Ltd. is committed to acting ethically and with integrity in all our business dealings and relationships, enforcing effective systems and controls to prevent modern slavery in our operations and supply chains, and ensuring transparency in line with our disclosure obligations under the Modern Slavery Act 2015.

1.5 We hold our suppliers to the same high standards, and our contracting processes include prohibitions against modern slavery, expecting suppliers to enforce these standards within their networks.

### **2. IDENTIFYING MODERN SLAVERY**

2.1 Modern slavery risks may exist within our business operations, our supply chains, and outsourced activities, especially in regions with inadequate modern slavery safeguards.

2.2 Victims of modern slavery may not recognize their exploitation. Key indicators include a lack of personal identification, evidence of control by another, restricted communication, limited social interaction, and signs of fear or coercion.

### **3. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE**

3.1 The Directors of Project CÜRV, a trading name of CURV360 Ltd. are responsible for ensuring compliance with this policy's legal and ethical obligations.

3.2 All staff members are required to adhere to this policy, and all suppliers are obligated to comply with this policy.

#### **4. REPORTING MODERN SLAVERY**

4.1 Incidents or suspicions of modern slavery must be reported immediately. Staff should report to their Line Manager, and Suppliers should report to their primary company contact.

#### **5. PUBLICATION OF THIS POLICY**

5.1 This policy is to be communicated to all staff and relevant stakeholders. The policy outlines the nature of modern slavery, how to identify it within our operations and supply chains, and the protocols for reporting suspected cases.

5.2 The policy is available on the Project CÜRV, a trading name of CURV360 Ltd. website and is accessible to our suppliers and the public.

#### **6. BREACHES OF THIS POLICY**

6.1 Employees who violate this policy may face disciplinary action, up to and including dismissal for misconduct or gross misconduct.

6.2 Project CÜRV, a trading name of CURV360 Ltd. reserves the right to terminate relationships with any supplier found to be in breach of this policy, in line with the principles set by Project Better Energy Ltd (PBE).

#### **7. POLICY REVIEW**

7.1 The CEO, in conjunction with Human Resources and the Compliance Manager, will review this policy annually to ensure it meets current legal and ethical standards.

7.2 This policy is not a part of any employment contract and may be amended at any time.

#### **8. APPROVAL**

8.1 This policy has been approved by the board of directors and will be reviewed and, if necessary, updated annually in accordance with legal requirements and best practices.

#### **9. TRAINING**

9.1 Essential training on modern slavery and human trafficking is provided to all relevant employees, reinforcing the company's commitment to ethical labour practices.



## **10. SUPPLIER DUE DILIGENCE**

10.1 We perform due diligence on all new suppliers and conduct regular reviews of existing suppliers to ensure compliance with this policy.