

<b>TITLE:</b>	Modern Slavery and Anti-Trafficking Policy
<b>POLICY OWNER:</b>	Chief Financial Officer
<b>ID / VERSION NUMBER:</b>	CO-0024 – Version 1
<b>EFFECTIVE DATE:</b>	April 1, 2024

**PURPOSE:**

The purpose of this Policy is to outline Calian’s strict prohibition of human trafficking and modern slavery in all forms and its compliance with all applicable laws related thereto.

**SCOPE:**

This Policy applies to Calian Group Ltd. and its subsidiaries (collectively “**Calian**”), including all Calian employees, contractors, directors, officers, executives, management and any other parties conducting work on Calian’s behalf (collectively “**Calian Personnel**”). All vendors, suppliers, customers, consultants, partners or any other third parties conducting business with Calian (collectively “**Third Parties**”) shall also be bound by this Policy as a condition of doing business with Calian.

**POLICY:**

1. Calian strictly prohibits and will not tolerate human trafficking or modern slavery of any kind, including, without limitation, forced and child labour. Calian has developed and maintains this Policy for combating trafficking and modern slavery in persons in accordance with all applicable laws, regulations and requirements to ensure that the risk of such practices is mitigated within Calian’s business and operations.

**Prohibited Conduct**

2. Any party to whom this Policy applies is strictly prohibited from:
  - a) Engaging in any form of human trafficking or slavery, including, but not limited to;
    - i. sex trafficking, in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age. “Commercial sex act” means any sex act on account of which anything of value is given to or received by any person;
    - ii. child labour, being labour or services provided or offered to be provided by persons under the age of 18 years and that: (1) are contrary to applicable laws; (2) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them; (3) interferes with their schooling by: depriving them of the opportunity to attend school,

obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work; or (4) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999; and

- iii. forced labour, being labour or service provided or offered to be provided by a person under circumstances that use force, fraud, or coercion, including: (1) by threats of serious harm to, or physical restraint against, that person or another person; (2) by means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labour or services, that person or another person would suffer serious harm or physical restraint; (3) by means of the abuse or threatened abuse of law or the legal process, for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery; (4) circumstances that constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930; or (5) any other circumstances that could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service.
- b) Destroying, concealing, confiscating, or otherwise denying access by a member of Calian Personnel or any Third Party to their identity or immigration documents, such as passports or driver's licenses, regardless of issuing authority.
  - c) Using misleading or fraudulent practices during the recruitment of or offering of employment, such as (1) failing to disclose basic information, in a format and language understood by the employee or employment candidate; and (2) making material misrepresentations during the recruitment of employees or employment candidates regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided or arranged by Calian), any significant costs to be charged to employees or employment candidates, and, if applicable, the hazardous nature of the work.
  - d) Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place.
  - e) Charging employees or employment candidates recruitment fees.
  - f) If required by law or contract,
    - i. failing to provide return transportation to an applicable employee when his or her employment is at an end or failing to pay for the cost of return transportation upon the end of such employment;

- ii. providing or arranging housing to employees that fails to meet the host country's housing and safety standards; and
- iii. failing to provide an employment contract, recruitment agreement, or other required work document in writing ("**Work Document**") to the applicable employee or employment candidate. Such Work Document shall be in a language the applicable employee or employment candidate understands. If an employee must relocate to perform the work, the Work Document shall be provided to the employee at least five days prior to the employee's relocation. The Work Document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

### **Compliance, Reporting and Enforcement**

- 3. This Policy and its enforcement will be taken seriously, including the investigation of any breaches or alleged breaches. All parties subject to this Policy are expected to provide full cooperation into any investigation under this Policy.
- 4. Violations or suspected violations of this Policy should be immediately reported to a supervisor/manager or any level of management within Calian that the reporting party feels comfortable with. Any party who receives a submission from any person regarding a reportable activity shall immediately report such submission to Calian's Chief Financial Officer (the "**CFO**") or Chief Executive Officer (the "**CEO**"), regardless of the materiality of the suspected violation. If the reportable activity concerns the activities of the CFO or the CEO, then the submission should be passed on directly to the Chair of Calian's Governance and Risk Committee or Chair of Calian Group Ltd.'s Board of Directors. Violations or suspected violations of this Policy may also be reported to any of the following hotlines:
  - a) The hotline phone number of the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at [help@befree.org](mailto:help@befree.org).
  - b) The Canadian Human Trafficking Hotline at 1-833-900-1010 and its email address [hotline@ccteht.ca](mailto:hotline@ccteht.ca).
  - c) The US National Human Trafficking Hotline at 1-888-373-7888.
- 5. Sanctions for breach of this Policy may be imposed by Calian, including termination of employment or applicable contract. Any violation of this Policy, which also constitutes a violation of applicable laws, may result in criminal proceedings, the consequences of which can include a fine and/or imprisonment.
- 6. Any report of a violation of this Policy made in good faith shall not be subject to any form of reprisal, provided the reporting party is not involved or implicated in the violation. If the

reporting party is involved or implicated in the violation, the party's act of self-reporting the violation will be considered when determining an appropriate sanction.

### Policy Assessment

7. Calian may periodically review and assess this Policy and changes or modifications may be implemented from time to time without notice as Calian deems necessary.

CHANGE HISTORY			
Version	Date (dd mmm yy)	Author	Explanation
1	1 Apr 24	K. Coburn	Policy creation