

Policy Against Modern Slavery and Human Trafficking

I. Introduction

1.1. AUTONOM SERVICES NV (hereinafter "AUTONOM") adopts this policy against modern slavery and trafficking in human beings in accordance with the European Convention on Human Rights and applicable national legislation (hereinafter "legislation").

II. The Position of Autonom

2.1. 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 person for the purpose of personal or commercial exploitation.

2.2. AUTONOM declares that it acts firmly and with integrity in all its business activities and relationships, implements and enforces systems and methods of control in order to ensure that no act involving modern slavery takes place in any of its businesses or in the supply/distribution chain.

III. Policy Goal

3.1. The purpose of this policy is to present the responsibilities assumed by AUTONOM, its employees and collaborators, as well as to make the public aware of the position adopted by AUTONOM towards modern slavery and human trafficking.

IV. Implementation

4.1. This Policy against modern slavery and human trafficking (hereinafter the "Policy") applies to AUTONOM and all of its subsidiaries, divisions and affiliated companies worldwide (collectively "AUTONOM Group").

4.2. The Policy shall be adhered to and carried out by all AUTONOM employees, collaborators, directors and managers (collectively referred to in this Policy as "Employees").

4.3. AUTONOM will actively investigate any suspected violation of this Policy and, where appropriate, take disciplinary action for cause against any Employee who has violated this Policy.

4.4. AUTONOM will also enforce appropriate legal and contractual sanctions against any AUTONOM business representative or other business partner who is found to have committed an action of modern slavery.

4.5. AUTONOM declares that it will provide appropriate compliance and ethics training to its employees.

- 4.6.** AUTONOM employees are encouraged to consult with a supervisor or the Compliance Officer if they are unsure about applicable laws, regulations or instructions. Also, if there is ever any doubt as to whether a particular action, act, treatment of workers in general, or their working conditions in the supply chain is taking place under any of the various forms of modern slavery, you can notify the Compliance Officer or a superior.
- 4.7.** No AUTONOM Employee shall suffer the risk of demotion or other disciplinary action for compliance with this Policy.
- 4.8.** All AUTONOM Employees are required to immediately report to their supervisors or the Compliance Officer any known or suspected deviation from this Policy by any other AUTONOM Associate, affiliated third party or business partner. Employees must never be prevented by threat of disciplinary action or other adverse treatment from raising known or suspected issues of compliance with the policy by others.

V. What Slavery, Servitude, Forced Labour And Human Trafficking Are

- 5.1.** Slavery is the exercise of property rights over a person.
- 5.2.** Servitude is the obligation to provide services, an obligation imposed by physical or moral constraint.
- 5.3.** Forced or compulsory labour is any work or services imposed on a person under threat or for which the person has not freely given consent. Forced labour does not include activities imposed by public authorities:
- a. under the law on compulsory military service;
 - b. for the fulfilment of civic obligations established by law;
 - c. on the basis of a final court sentence, under the terms of the law;
 - d. in case of force majeure, i.e. in case of war, catastrophe or danger of catastrophe such as fires, floods, earthquakes, epidemics or violent epidemics, animal or insect invasions and, in general, in all circumstances that endanger the life or normal conditions of existence of the whole population or part of it.
- 5.4.** Human trafficking is the arranging or facilitating the movement of another person by unlawful means for the purpose of exploitation.

VI. Indicators

- 6.1.** In preventing, detecting and stopping modern slavery and human trafficking, AUTONOM employees will use the following list of key signs that may indicate that someone may be a victim of slavery or human trafficking:
- The person is not in possession of his/her own passport, identity papers or travel documents.
 - The person behaves as if being instructed or guided by someone else.

- The person allows someone else to speak for them when someone is addressing them directly.
- The person is taken to and from work.
- The person is withdrawn or seems frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside of their immediate environment.
- The person shows physical injuries and signs of abuse and malnutrition.
- The person has an unkempt appearance, is often in the same clothes and has poor hygiene.

6.2. The above list is by way of example, AUTONOM employees are alert to any other indications that might raise suspicions.

6.3. A person may show several of the signs mentioned above, but may not necessarily be a victim of slavery or trafficking. Often, a person's circumstances can give the impression that something is wrong. If there is a suspicion, it should be reported to your supervisor or the Compliance Officer

VII. Responsibilities

7.1. Everyone must comply with this policy and be aware that ignoring it is unacceptable.

7.2. AUTONOM:

- a. maintains policies and procedures aimed at preventing exploitation and preventing trafficking in human beings, and protects the workforce;
- b. adopts a transparent position on recruitment policy;
- c. checks supply/distribution chains;
- d. has an open and transparent complaints process for all staff;
- e. tries to raise awareness so that employees know what they are doing;
- f. promotes appropriate welfare practices;
- g. makes a clear statement that it takes its responsibilities towards our employees and customers seriously and genuinely;

7.3. Managers:

- a. listen and are open to their colleagues;
- b. remain alert to any indicators of slavery;
- c. raise awareness among their colleagues, discuss the issues and organise training so that everyone can recognise the indicators of slavery and human trafficking and act in accordance with this policy.

7.4. All Autonom Employees have responsibilities under this policy. Whatever your position at Autonom, you must:

- a. be careful around you – if you suspect that someone (a colleague or other person, collaborator or client) is being controlled or forced by someone else to work or provide various services, follow the reporting procedure

- b. follow the reporting procedure if a colleague tells you something that you think might be an indication that they or someone else is being exploited.

VIII. Reporting

- 8.1.** If you talk to someone about your concerns, you can help stop abuse or exploitation of a person.
- 8.2.** If you think someone is in immediate danger, dial 112.
- 8.3.** Otherwise, you should discuss your concerns with your supervisor or Compliance Officer, who will decide what action needs to be taken and provide any additional advice.
- 8.4.** Not all victims may wish to be helped and there may be cases where reporting a suspected case of trafficking puts the potential victim at risk, so it is important that, in the absence of immediate danger, you first discuss your concerns with your supervisor or Compliance Officer before taking further action.
- 8.5.** Any AUTONOM Employee who does not adhere to this Policy may face disciplinary action, which may result in termination of employment with possible immediate dismissal.
- 8.6.** Any reporting will be treated in the strictest confidence and there will be no action against the complainant as a result of the report, as the complainant is protected.
- 8.7.** Also, any reporting must be done in good faith, about real facts and actions, based on the objective judgement of the reporter.
- 8.8.** This procedure applies to all AUTONOM Employees and is implemented, monitored and enforced on an ongoing basis.

IX. Due Diligence Processes To Prevent Slavery And Human Trafficking

- 9.1.** Due to the nature of the AUTONOM business and the business model we have, we believe there is a low risk of slavery and human trafficking in our distribution and supply chains. As part of our initiative to identify and mitigate risk in our business, we take proactive steps to know our suppliers and have systems in place to:
 - 9.1.1.** Identify and assess areas of potential risk in our supply and distribution chains;
 - 9.1.2.** Reduce the risk of slavery and human trafficking in our supply and distribution chains;
 - 9.1.3.** Monitor areas of potential risk in our supply and distribution chains;
 - 9.1.4.** Protect whistleblowers.
- 9.2.** We have zero tolerance for slavery and human trafficking. To ensure that everyone in our supply and distribution chain and contractors comply with the rules, we develop a due diligence process to determine the measures taken by our suppliers to combat slavery and human trafficking in their own business and supply chain.

- 9.3.** All employees are provided with courses, trainings and video trainings in order to understand and apply this policy correctly through team leaders or managers.
- 9.4.** AUTONOM will review this policy on a regular basis, at least annually. We will provide employees with information and/or training on any changes we make.