

Modern Slavery and Human Trafficking Policy

I. Introduction and Yabimo's principles

- 1. Modern slavery encompasses slavery, servitude, human trafficking, forced and compulsory labour. It is a crime and a violation of human rights.
- Yabimo has a zero-tolerance approach to modern slavery. We are committed
 to implementing and enforcing effective systems that ensure modern slavery does not take place
 anywhere in its business or in any of its supply chains.
- 3. The prevention, detection and reporting of modern slavery in any part of our organization or supply chain is the responsibility of all those working for us or on our behalf.
- 4. If we find that other individuals or organizations working on our behalf have breached this policy we will ensure that we take appropriate action. Any Yabimo employee who breaches this Policy shall face disciplinary action.
- 5. Yabimo shall always cooperate with the relevant authorities in relation to any substantiated allegations of a breach of human rights legislation.
- 6. This Policy covers all of Yabimo's employees and key business partners.

II. Our Policies relating to Modern Slavery

- 1. Our Human Rights Policy includes a declaration that people should work because they want or need to, not because they are forced to do so. We prohibit the use of prison labour, forcibly indentured labour, bonded labour, slavery or servitude. In this policy we also affirm that we do not employ children or support the use of child labour. We do however, encourage the creation of educational, training or apprenticeship programs tied to formal education for young people.
- 2. In our Corporate Social Responsibility Policy & Code of Conduct we explicitly and firmly declare that we not engage or employ people against their own free will, nor will personnel be required to lodge "deposits" or identity papers upon commencing employment. YABIMO does not engage or employ people through any form of forced labour as defined by international labour standards. All Yabimo's actions comply with all applicable laws and regulations. We are also aligned with the Ten Principles of the UN Global Compact and the UN Declaration of Human Rights.
- 3. Our **Whistleblowing Policy** applies when our employees, suppliers, business partners or other stakeholders have been faced with situations that have forced them to question inappropriate attitudes or practices. YABIMO guarantees absolute confidentiality



- of reports and the data contained therein, as well as the anonymity of applicants or any other person who submits the report, also if it turns out to be incorrect or unfounded.
- 4. All of our policies are endorsed and signed off by Yabimo's Top Management. These documents are applicable to all of Yabimo operations and are available on our intranet.

III. Practices relating to preventing Modern Slavery

- 1. Our activities related to the prevention of modern slavery in our operations and our supply chains include:
 - a. the application of contract clauses requiring the supplier to comply with all applicable laws,
 - b. the requirement of each supplier to complete a supplier questionnaire where appropriate (an obligation to comply with the Yabimo's Modern Slavery and Human Trafficking Policy),
 - c. implementation of human rights criteria for the supplier qualification and assessment process,
 - d. human rights risk monitoring, embedded in the corporate risk tool,
 - e. conduction of human rights and business ethics trainings,
 - f. communication campaigns conducted in order to increase awareness of our Policies,
 - g. execution of an internal annual audit to monitor our compliance with the Modern Slavery and Human Trafficking Policy.
- 2. Yabimo's Management at all levels are responsible for the implementation of this Policy and for ensuring that those reporting to them understand and comply with it and are given training on it.

Michał Olesiński

The President of the Board & CEO