



## Modern Slavery Policy

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# 1 Policy statement

Drone Major Group Limited (“Drone Major Group”, “DMG”, “we”, “our”) are committed to uphold the human rights of Staff and to treat them with dignity and respect as understood by the international community. This applies to all Staff including temporary, migrant, student, contract and direct employees.

This policy does not form part of an employee’s contract of employment and DMG may amend it at any time to improve its effectiveness at combatting bribery and corruption.

# 2 Purpose

The purpose of this policy is to set out the responsibilities of DMG and those who work for us regarding observing and upholding our zero-tolerance position on modern slavery.

It also exists to act as a source of information and guidance for those working for DMG. It helps them recognise and deal with modern slavery issues, as well as understand their responsibilities.

This policy is intended as a statement of policy and management guidelines. It does not form part of individual contracts of employment, and we may amend it at any time.

# 3 Application

This policy applies to all employees (whether temporary, fixed term, or permanent), consultants, contractors, introducers, trainees, seconded staff, home Staff, casual Staff, agency staff, volunteers, interns, agents, sponsors or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Directors, Trustees and Board members at any level. In the context of this policy all the above individuals are referred to as “employees”.

This policy applies to Drone Major Group Limited and all its subsidiaries:

- Drone Major Limited;
- Innovation Major Limited;
- Phoenix Major Limited;
- Phoenix I Limited;
- Phoenix II F&A Limited;
- Phoenix III Limited; and
- all companies that will be registered and added to the Group in the future.

In the context of this policy, “third party” refers to any individual or organisation DMG meet and work with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

# 4 Other applicable documents

The following document is applicable in relation to this policy:

- Drone Major Group Disciplinary and Grievance Procedure.

## 5 Definitions

### 5.1 Modern Slavery

Modern slavery is when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited:

#### 5.1.1 Human trafficking.

The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal

#### 5.1.2 Forced labour

Any work or services people are forced to do against their will, usually under threat of punishment

#### 5.1.3 Debt bondage/bonded labour

The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt

#### 5.1.4 Descent-based slavery (where people are born into slavery).

A very old form of slavery, where people are treated as property, and their "slave" status has been passed down the maternal line.

#### 5.1.5 Child slavery

When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery

#### 5.1.6 Forced and early marriage

When someone is married against their will and cannot leave. Most child marriages can be considered slavery

#### 5.1.7 Domestic servitude

Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person's home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.

#### 5.1.8 Conflict of interest

A conflict of interest is where an individual has private interests that may or do influence the decisions that they make as an employee or representative of an organisation.

## 6 Acceptable and unacceptable actions

### 6.1 Child Labour Avoidance

The term 'Child' refers to any person:

- a. under the age of 15 (or 14 where the law of the country permits);
- b. under the age for completing compulsory education; or (iii) under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Staff under the age of 18 shall not perform work that is likely to jeopardise their health and safety.

### 6.2 Hours of Work

Studies of business practices clearly link Worker strain to reduced productivity, increased turnover and increased risk of injury and illness. Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations.

### 6.3 Wages and Benefits

Compensation paid to Staff shall comply with all applicable local wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, Staff shall be compensated for overtime at pay rates greater than their regular hourly rates, if applicable. Deductions from wages as a disciplinary measure shall not be permitted. The basis on which Staff are being paid is to be provided in a timely manner via pay stub or similar documentation.

### 6.4 Humane Treatment

There is to be no harsh or inhumane treatment including (without limitation) sexual harassment; sexual abuse; corporal punishment; mental or physical coercion or verbal abuse of Staff; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to Staff.

### 6.5 Slavery and Human-Trafficking

We have zero tolerance to slavery, servitude, forced and compulsory labour and human trafficking, consistent with our disclosure obligations under the Modern Slavery Act 2015. Participants should have effective systems and controls to ensure that modern slavery is not taking place anywhere in their own business or in any of their supply chains.

### 6.6 Non-Discrimination

Participants shall be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race; colour; age; gender; sexual orientation; ethnicity; disability; pregnancy; religion; political affiliation; union membership; or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, Staff or potential Staff should not be subjected to medical tests that could be used in a discriminatory way.

### 6.7 Freedom of Association

Open communication and direct engagement between Staff and management are the most effective ways to resolve workplace and compensation issues. The rights of the Staff to associate freely, join or not join labour unions, seek representation, and join Staff' councils in accordance with local laws shall be respected. Staff shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

Participants will permit the audit of its employees' working conditions or provide evidence of workplace standards and details of fair pay and conditions upon request.

## 7 Company Responsibility

DMG are committed to compliance with and continual improvement of its policies and procedures, which are endorsed by the Executive Board. Our responsibilities include:

### 7.1 Management Accountability and Responsibility

DMG will clearly identify company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management will review the status of the management system on a regular basis.

### 7.2 Legal and Customer Requirements

DMG will establish a process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Policy.

### 7.3 Risk Assessment and Risk Management

A process to identify any risks associated with Modern Slavery, identify the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

### 7.4 Improvement Objectives

Develop performance objectives, targets and implementation plans to improve the DMGs social and environmental performance, including a periodic assessment of the Companies performance in achieving those objectives.

### 7.5 Training

Delivery programs for Staff to implement DMGs policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

### 7.6 Communication

Provide a process for communicating clear and accurate information about DMGs policies, practices, expectations and performance to Staff, suppliers and customers.

### 7.7 Feedback and Participation

Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code of Conduct and to foster continuous improvement.

### 7.8 Audits and Assessments

Conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Policy and customer contractual requirements related to social and environmental responsibility.

### 7.9 Corrective Action Process

Establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

### 7.10 Documentation and Records

Ensure that the creation and maintenance of documents and records are managed to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

## 8 Supplier Responsibility

A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

### 8.1 Supplier Due Diligence

Drone Major has a large network of suppliers and consultants with which we work across various contracts. All Consultants and Suppliers must abide by our Code of Conduct to ensure that we only source products and services from suppliers and facilities that share our commitment to these minimum standards.

## 9 Staff responsibilities

All employees of DMG must ensure to read, understand, and comply with the information contained within this policy, and with any training or other modern slavery information they may be given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of modern slavery. They are required to avoid any activities that could lead to, or imply, a breach of this Policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Compliance Officer.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. DMG have the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy. Details about disciplinary actions can be found in the Drone Major Group Disciplinary and Grievance Procedure.

## 10 Raising a concern

If you suspect that there is an instance of modern slavery activities occurring in relation to DMG, you are encouraged to raise your concerns at the earliest possible stage. If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the Compliance Officer.

DMG will familiarise all employees with its Whistleblowing Policy so employees can vocalise their concerns swiftly and confidentially.

### 10.1 Action to be taken if you are a victim of modern slavery

You must tell your Compliance Officer as soon as possible if you believe that you are a victim of another modern slavery.

### 10.2 Protection

If you refuse to engage in actions which could be considered as being in breach of this policy, DMG understands that you may feel worried about potential repercussions. DMG will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

DMG will ensure that no one suffers any detrimental treatment<sup>1</sup> as a result of refusing to engage in activities which could be construed as modern slavery.

If you have reason to believe you have been subjected to unjust treatment as a result of a concern or refusal to engage in activities which could be construed as modern slavery, you should inform the Compliance Officer immediately.

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<sup>1</sup> Detrimental treatment refers to dismissal, disciplinary action or unfavourable treatment in relation to the concern the individual raised.

## 11 Communication

DMG will make this policy part of the induction process for all new employees, and they will be asked annually to formally confirm that they have read and understood this policy and that they will comply with it.

DMG's Modern Slavery Policy shows a zero-tolerance attitude and will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

## 12 Document history

### General Information

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### Document History

Date	Author	Position	Comments
2023-01-20	Tanja Hentschke	Director of Compliance	New Policy

### Approval Register

Date	Name	Position
2023-02-02	Robert Garbett	Chief Executive

## 13 Signature

Signed for and on behalf of Drone Major Group Limited and all of its subsidiaries:

Date - 05 March 2023

Name - Robert Neil Garbett

Signature 