



Global Modern Slavery and Human Trafficking Policy

The Company of Animals is committed to conducting business ethically, responsibly and with respect for human rights throughout our global operations and supply chain. We recognise that modern slavery, human trafficking, forced labour, bonded labour, debt bondage, forced marriage, servitude, involuntary prison labour and child labour are serious violations of fundamental human rights and have no place in our business or value chain.

As a global organisation, we are committed to identifying, preventing, mitigating and addressing risks of modern slavery within our operations, supplier network and business relationships. We expect all employees, suppliers, contractors, agents and business partners to uphold the same standards and demonstrate a clear commitment to ethical labour practices.

This policy supports our Human Rights Policy, Supplier Code of Conduct, Sustainable Sourcing Guidelines and COA Embark Sustainability Strategy.

Purpose

The purpose of this policy is to:

- Establish our commitment to preventing modern slavery and human trafficking.
- Define expectations for employees, suppliers, contractors and business partners.
- Outline our due diligence, monitoring, reporting and remediation processes.
- Support compliance with applicable legislation and internationally recognised human rights frameworks.
- Promote transparency, accountability and continuous improvement across our global supply chain.
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Scope

This policy applies to:

- All employees, directors, officers and workers employed by The Company of Animals.
- Contractors, consultants, agency workers and temporary staff.
- Suppliers, manufacturers, subcontractors, logistics providers, service providers and business partners.

It applies globally to our operations, facilities and supply chains, including direct and indirect suppliers, labour providers and subcontractors.

Legal and Guiding Frameworks

Our approach is informed by applicable laws and internationally recognised standards, including:

- UK Modern Slavery Act 2015.
- Australian Modern Slavery Act 2018 (Cth).
- Applicable U.S. federal, state and local laws, including the California Transparency in Supply Chains Act where applicable.
- Applicable Dutch and EU human-rights and supply-chain due-diligence requirements.
- United Nations Guiding Principles on Business and Human Rights.
- Universal Declaration of Human Rights.
- International Labour Organization (ILO) Core Conventions.



- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Where applicable law provides greater protection or imposes additional requirements, that law will apply.

Our Commitments

Zero Tolerance

The Company of Animals has a zero-tolerance approach to modern slavery and human trafficking in all forms. We are committed to ensuring that all work is freely chosen and that every individual is treated with dignity, fairness and respect.

Forced Labour and Human Trafficking

We prohibit forced labour, bonded or debt-bonded labour, indentured labour, involuntary prison labour, human trafficking and any form of coercion, threats, intimidation or unreasonable restriction of freedom of movement.

Workers must not be required to surrender identity documents, passports or work permits as a condition of employment and must be free to leave employment in accordance with applicable law.

Prohibition of Child Labour

We do not tolerate child labour within our operations or supply chain. Suppliers must comply with applicable minimum-age laws and internationally recognised standards. Young workers who are legally employed must be protected from hazardous work and activities that may affect their health, development, education or wellbeing.

Ethical Recruitment

We support responsible recruitment practices. Workers should receive clear employment terms before commencing work, understand their rights and responsibilities and not be charged recruitment fees where prohibited by law or Company standards.

Fair Treatment and Working Conditions

We expect workers to receive fair wages and benefits, legal working hours and rest periods, safe and healthy working conditions, freedom from harassment, abuse, discrimination and retaliation, and respect for freedom of association and collective bargaining rights where permitted by law.

Supply Chain Responsibility

We recognise that modern slavery risks may exist beyond our direct suppliers.

We expect suppliers to maintain effective systems for identifying and managing labour and human-rights risks throughout their own supply networks, including raw material suppliers, subcontractors, labour agencies, service providers and logistics partners where appropriate.

Due Diligence and Risk Assessment

We maintain a risk-based approach to managing modern slavery risks and will assess our operations and supply chain periodically, including at least annually where appropriate.

Our due diligence may include:



- Supplier onboarding assessments and questionnaires.
- Sustainability and ethical sourcing reviews.
- Human rights and labour practice assessments.
- Independent audits and verification.
- Corrective action plans.
- Ongoing supplier performance reviews.

Higher-risk geographies, industries, labour models and sourcing categories may be subject to enhanced due diligence.

Supplier Expectations

Suppliers and business partners are expected to:

- Comply with this policy and our Supplier Code of Conduct.
- Comply with applicable laws and regulations.
- Maintain controls addressing modern slavery risks.
- Cooperate with audits and assessments.
- Provide accurate and transparent information.
- Report actual or suspected serious violations promptly.

Failure to address identified issues may affect ongoing business relationships.

Reporting and Grievance Mechanisms

Employees, workers, suppliers and other stakeholders are encouraged to report concerns regarding modern slavery, human trafficking or labour-rights violations.

Reports may be raised through:

- Line management.
- Human Resources.
- Designated ethics or compliance channels.
- The Company's whistleblowing or ethics reporting process, where available.
- Supplier engagement processes.

The Company will ensure appropriate reporting channels are available to relevant employees and stakeholders globally.

Reports will be reviewed and investigated appropriately. The Company prohibits retaliation against anyone who raises a concern in good faith. Reports will be handled confidentially and sensitively, subject to applicable law.

Remediation

Where modern slavery or human trafficking is identified, we will take appropriate action. This may include investigation, supplier engagement, corrective action plans, support for affected workers where appropriate, escalation to senior management and suspension or termination of business relationships where serious violations persist.

Our objective is to address root causes wherever possible and improve labour conditions.



Training and Awareness

Training and awareness may be provided to employees involved in procurement, sourcing, supply chain management, supplier relationships, logistics, sustainability, HR and compliance.

Training will focus on recognising risk indicators, supplier engagement, reporting mechanisms and individual responsibilities.

Governance and Accountability

Responsibility for overseeing this policy rests with senior management. The Chief Executive Officer holds primary responsibility for implementation and monitoring its effectiveness.

Leaders across the business are expected to promote ethical business practices, support implementation, address identified risks and ensure appropriate resources are available.

Transparency and Local Reporting Requirements

Where required by applicable law, The Company of Animals will prepare, approve, publish and/or lodge relevant modern slavery or human-rights statements.

This includes applicable requirements under the UK Modern Slavery Act and Australian Modern Slavery Act.

For Australia, entities meeting the applicable AUD \$100 million consolidated revenue threshold may be required to publish and lodge an annual Modern Slavery Statement.

For the UK, qualifying commercial organisations meeting the applicable £36 million turnover threshold may be required to publish an annual Modern Slavery Statement.

The Company will also comply with applicable U.S., Dutch and EU transparency and due-diligence requirements.

Monitoring and Continuous Improvement

We recognise that preventing modern slavery requires ongoing vigilance.

We are committed to:

- Regularly reviewing our policies and procedures.
- Monitoring emerging risks.
- Engaging with suppliers and stakeholders.
- Strengthening due diligence.
- Tracking progress against sustainability objectives.
- Improving transparency and accountability.

Review and Updates

This policy will be reviewed periodically and updated as necessary to reflect changes in legislation, regulatory requirements, stakeholder expectations and business operations.

Any revisions will be communicated to employees and relevant third parties as appropriate.

Conclusion

The Company of Animals is committed to protecting human rights and preventing modern slavery in all its forms. Through responsible sourcing, due diligence, ethical partnerships and



continuous improvement, we seek to build a supply chain that reflects our values and supports the welfare of people, communities and animals worldwide.

Guided by our values of **Be Kind. Be Fair. Be Bold.**, we are committed to conducting business responsibly and creating a positive impact across our global operations and supply chain.

Emily Mugford

Dr Emily Mugford
CEO