

Type:	Group Wide Procedure				
Document:	Ethics, Equal Opportunities, Harassment & Modern Slavery Policy				
Document #	EQ1.0	Revision#	0	Next Scheduled Revue	11/25

## Statement of Intent

### Fair Trade / Supply Chain Ethics Policy

Fairtrade is about better prices, decent working conditions, local sustainability, and fair terms of trade for factory workers, farmers and workers in the developing world. The costs of products that consumers buy start with the producer which runs counter to the way in which retailers normally set prices. Fairtrade addresses the injustices of conventional trade, which traditionally discriminate against the poorest, weakest producers in the developing world. Price stability covers their production costs, and a social or community premium means that their organisation will be able to reinvest either in the business or social and environmental schemes among the wider community. It enables workers and their communities to improve the lives of local people and have more control over their lives.

- Think Access Group Ltd will not knowingly purchase good or items from any supplier whose business may allow for or include any slave labour, child labour or illegal activities.
- Think Access Group Ltd will where possible and commercially viable choose a Fairtrade supplier in preference to a supplier who does not have a fair-trade agreement or policy.
- Think Access Group Ltd does not condone bribery for commercial advantage. The company will continuously develop policies and procedures that govern activities at risk of bribery. Particular consideration will be given to:
  - Gifts, hospitality and entertainment
  - Facilitation payments
  - The use of agents, consultants and other intermediaries
  - Political and charitable contributions
  - Due diligence procedures relating to business partners including acquisitions, joint ventures and other relationships and contracts and bids
  - Think Access Group Ltd expect all its suppliers (and supplier to suppliers) and contractors to comply with this policy as a minimum standard.

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### Modern Slavery Policy

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within Think Access Group Ltd.

As part of the company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc ) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

This policy statement will be reviewed annually and published. This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001 and OHSAS 18001. The implementation and operation of this management system underlines our commitment to this policy.

### Equal Opportunities Policy

The Company is proud to be an equal opportunity employer. We are committed to ensuring within the framework of the law that our workplaces are free from unlawful or unfair discrimination because of Protected Characteristics as defined by the Equality Act 2010. We have adopted this policy as a means of helping to achieve these aims.

The Protected Characteristics are:

- Age
- Disability
- Gender Reassignment
- Race
- Religion or Belief
- Sex
- Sexual Orientation
- Marriage and Civil Partnership
- Pregnancy and Maternity

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### Harassment Policy

Think Access Group is committed to providing a pleasant working environment for its employees. Harassment pollutes the working environment and can have a devastating effect on the health, confidence, morale and performance of those affected by it. It may also have a damaging effect on other employees or contractors not themselves the object of unwanted behaviour who are witness to it or who have knowledge of the behaviour. All contractors are entitled to a working environment which respects their personal dignity and which is free from such objectionable conduct. Think Access Group Ltd will investigate any matter of harassment as it would any other serious disciplinary offence.

### Responsibilities

All employees are required to comply with measures put in place. Think Access Group Ltd recognise that the full cooperation of all employees is vital if these policies are to be effective. We will endeavour to make all employees aware of their own and our responsibilities regarding these policies – full details of these policies are held within the employee and contractor handbook. Think Access Group Ltd will provide adequate resources to ensure that its legal obligations are satisfied.

The person named below is responsible for overseeing all related matters, and will ensure that all employees:

- Comply with the requirements of these policies and co-operate in their application.
- Arrangements are in place and procedures agreed to implement the requirements of this Policy.

Signed:

*Michael Grimbleby*

Michael Grimbleby: Managing Director

Date: 31st October 2024