



Human Rights and Modern Slavery Policy

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📁 Policies

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Summary:

CEK-POL-009 · Version 1.0 · Issued October 2026 · Cekera Ltd1. PurposeCekera respects the human rights of every person affected by its business. This policy sets out the Company's commitments and how

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1. Purpose

Cekera respects the human rights of every person affected by its business. This policy sets out the Company's commitments and how it works to prevent involvement in human rights abuse, including modern slavery.

2. Scope

This policy applies to all Personnel and to the Company's dealings with suppliers, customers and other business partners.

3. Standards

Cekera is guided by:

- the International Bill of Human Rights;
- the International Labour Organization Declaration on Fundamental Principles and Rights at Work;
- the United Nations Guiding Principles on Business and Human Rights;
- the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Where national law and these standards differ, Cekera follows the higher standard, and where they conflict it seeks to honour the international standard to the greatest extent the law allows.

4. Our commitments

- **No forced labour:** all work must be voluntary. Cekera does not use or tolerate forced, bonded, indentured or involuntary prison labour, or human trafficking.
- **No child labour:** Cekera does not employ any person below the legal minimum working age, and never below 15.
- **Fair treatment:** no person is subjected to physical punishment, threats, harassment or abuse.
- **Non-discrimination:** employment decisions are based on ability and conduct alone.
- **Fair pay and hours:** wages and working hours comply at least with applicable law.
- **Freedom of association:** lawful rights to organise and bargain collectively are respected.



- **Safe work:** working conditions protect health and safety.
- **Communities:** Cekera respects the rights of communities affected by the activities it supports.

5. Modern slavery in the supply chain

The Company's greatest exposure to human rights risk is through its supply chain and logistics. Cekera therefore:

- requires suppliers to comply with the Supplier Code of Conduct;
- considers labour and human rights risk, by country and by product, when selecting suppliers;
- sources as far as possible from established manufacturers with their own published labour standards;
- seeks contractual commitments on labour standards from higher-risk suppliers;
- follows up credible indications of abuse and requires corrective action.

6. Indicators of modern slavery

Personnel should be alert to signs such as workers whose identity documents are held by an employer, workers who owe recruitment debts, restrictions on movement, withheld wages, excessive overtime under threat, and workers who appear fearful or unable to speak freely.

7. Remedy

Where Cekera finds that it has caused or contributed to an adverse human rights impact, it will act to stop it and will provide for or cooperate in appropriate remedy. Where the impact is linked to a supplier, Cekera will use its influence to secure correction, and will end the relationship if the supplier will not correct a serious abuse.

8. Reporting

Concerns may be raised under the Whistleblowing (Speak Up) Policy at compliance@cekera.com.

9. Responsibilities

The Director of Cekera has overall responsibility for this policy and for ensuring that it is applied.

The Compliance Officer is responsible for day-to-day implementation, for giving guidance, for maintaining the records this policy requires and for reporting to the Director. Until a separate appointment is made, the Director acts as Compliance Officer.

All Personnel are responsible for reading, understanding and complying with this policy.

10. Breaches of this policy

A breach of this policy is a serious matter. It may result in disciplinary action up to and including dismissal, or in the termination of a contract with a third party. Where a breach may also be a criminal offence, Cekera may report it to the competent authorities.



11. Questions and reporting concerns

Questions about this policy should be addressed to the Compliance Officer at compliance@cekera.com. Any suspected breach must be reported promptly, in accordance with the Whistleblowing (Speak Up) Policy. No person will suffer retaliation for reporting a concern in good faith.

12. Review

This policy is reviewed at least once a year, and whenever there is a material change in the law or in the business of Cekera. Changes are approved by the Director.