



PENINSULA

**Peninsula Group Human Rights
and Anti Modern Slavery Policy**

March 2025

Index

Introduction	3
Core human rights principles	
- Modern slavery and human trafficking	3
- Peninsula’s suppliers	4
- Training	4
Monitoring and accountability	
- Ongoing monitoring	4
- Zero tolerance approach	4
- Your responsibilities and how to raise a concern	4
- Continuous improvement	5
- Contact information	5

Introduction

Peninsula is committed to upholding the highest standards of ethical conduct and respect for human rights across our operations and supply chain. This Human Rights & Anti Modern Slavery Policy outlines Peninsula's commitment to ensuring that human rights are respected and protected in all aspects of its business, including the prevention of modern slavery and human trafficking.

Core Human Rights Principles

Peninsula maintains the following core principles:

- **Respect for Human Dignity:** Peninsula treats all individuals with respect and dignity, regardless of race, gender, age, religion, disability, sexual orientation, or any other characteristic protected by law.
- **Non-Discrimination:** Peninsula provides equal employment opportunities and ensure that all employees and job applicants are treated fairly and without discrimination.
- **Freedom of Association:** Peninsula supports the rights of employees to freely associate and join trade unions or other employee organisations in accordance with local laws.
- **Fair Wages and Working Hours:** Peninsula ensures fair compensation and reasonable working hours in compliance with legal requirements.
- **Safe and Healthy Working Conditions:** Peninsula provides a safe and healthy work environment and comply with all relevant health and safety regulations.
- **Child Labor and Forced Labor:** Peninsula strictly prohibits the use of child labour and forced or compulsory labour.
- **Privacy and Data Protection:** Peninsula respects individual privacy and protect personal data in accordance with applicable laws.

Modern Slavery and Human Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Peninsula has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all of its business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

Peninsula is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. Peninsula expects the same high standards from all of its contractors, suppliers, and other business partners and, as part of its contracting processes, Peninsula includes specific prohibitions against the use of forced, compulsory or trafficked labour,

or anyone held in slavery or servitude, whether adults or children, and Peninsula expects its suppliers to hold their own suppliers to the same high standards.

Peninsula's Suppliers

Peninsula conducts thorough vetting of all new suppliers, including a specific compliance check related to modern slavery and human trafficking, and is continuously developing procedures to monitor potential risk areas in its business and supply chains.

Training

Peninsula recognises the importance of equipping its staff to identify and address modern slavery risks. Accordingly, Peninsula mandates e-learning training on modern slavery for all employees and conducts ongoing internal communications regarding its policies and procedures. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Monitoring and Accountability

Ongoing Monitoring

Peninsula continuously monitors the risk of modern slavery within its business and supply chain. Peninsula's Senior Management Team has overall responsibility for ensuring compliance with our human rights and modern slavery standards.

Zero-Tolerance Approach

Any reports of modern slavery within Peninsula are treated as a priority. Peninsula adopts a zero-tolerance approach and investigate all such reports thoroughly.

Your responsibilities and how to raise a concern.

The prevention, detection, and reporting of modern slavery in any part of Peninsula's business or supply chains is the responsibility of all those working for Peninsula or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their line manager as soon as possible if they believe or suspect that a breach of this policy has occurred or may occur in the future. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of Peninsula's business or supply chains of any supplier tier at the earliest possible stage.

Employees should note that where appropriate, and with the welfare and safety of local workers as a priority, Peninsula may give support and guidance to its suppliers to help them address coercive or exploitative work practices in their own business and supply chains. If employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of Peninsula's supply chains constitutes any of the various forms of modern slavery, it should be raised with their line manager.

Peninsula aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Peninsula is committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

Continuous Improvement

This policy is regularly reviewed updated to reflect legal changes, emerging best practices, and Peninsula's own learnings. Peninsula will communicate significant updates to all stakeholders. Employees are invited to comment on this policy and suggest ways in which it might be improved.

Contact Information

For questions, concerns, or to report human rights or modern slavery violations, please contact HR@peninsula360.com.

Thank you for your commitment to Peninsula and for understanding the role you all play in the fight against modern slavery and human trafficking.



John A. Bassadone
CEO of the Peninsula Group
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