

ANTI-SLAVERY POLICY

1. Applicability

- 1.1 This policy applies to of Kardomagh Holdings Ltd and all its subsidiaries, including Spatial Initiative Limited, Extraspace Solutions and Extraspace Solutions (UK) Limited (referred to as 'ESS Modular').
- 1.2 By virtue of the fact that Kardomagh Holdings Limited carries on demonstrable business in the UK through its subsidiaries referred to in paragraph 1.1 above, it has adopted this policy on behalf of all Group Companies.
- 1.3 Together, the above companies will be referred to as "**ESS Modular**".

2. Purpose

- 2.1 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 ("**Modern Slavery**") - all of which share in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. ESS Modular is committed to implementing and enforcing effective systems and controls to ensure that Modern Slavery is not taking place anywhere in our business or supply chains.
- 2.2 We are also committed to ensuring there is transparency in our approach to tackling Modern Slavery throughout our supply chains - consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We expect that our suppliers will hold their own suppliers to the same high standards.
- 2.3 This policy applies to all those working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, supplier, external consultants, third-party representatives and business partners.
- 2.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. Responsibility for the policy

- 3.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 The Head of Supply Chain has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering Modern Slavery.
- 3.3 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.
- 3.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Head of Supply Chain.

4. Compliance with the policy

- 4.1 You must ensure that you read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 You must notify the Head of Supply Chain as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. This will allow ESS Modular to implement its Anti-Slavery Response Plan.
- 4.4 You are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chains – at any supplier tier - at the earliest possible stage. Again, this will permit ESS Modular to implement its **Anti-Slavery Response Plan**.
- 4.5 If you believe or suspect a breach of this policy has occurred or may occur, you must notify the Head of Supply Chain or report it in accordance with our Whistleblowing Policy as soon as possible. Where appropriate, and with the welfare and safety of workers as a priority, we may give support and guidance to our suppliers to help them address the risk of coercive or exploitative work practices in their own business and supply chains.

4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of Modern Slavery, raise it with your manager or the Head of Supply Chain.

4.7 We aim 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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Supply Chain or HR Director immediately.

5. Communication and awareness of this policy

5.1 Our commitment to addressing the issue of Modern Slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breaches of this policy

6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6.3 **Please refer any queries about this policy to the Head of Supply Chain.**



Paul Tierney, Chief Executive Officer

Date: 3rd June 2021