



MODERN SLAVERY POLICY

VERSION: 1.0

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Document Summary

Background	It is estimated that millions of people worldwide suffer from some degree of forced labour. Consequently, regulators in various countries have implemented laws aimed at combatting modern slavery within business operations and supply chains. FSD Africa has developed this policy to articulate its position on modern slavery, increase awareness of the issue, and provide guidance on identifying and reporting potential instances of modern slavery within its operations. This proactive approach aims to effectively address the issue of modern slavery.	
Related Policies	<ul style="list-style-type: none">• Procurement policy,• Anti-Corruption policy,• ESG policy,• Supplier code of conduct,• Whistleblowing policy	
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Approvers	DCS	Yes
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Document Control

Ownership

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1. Executive Summary

This policy communicates FSD Africa's zero-tolerance stance on Modern Slavery. It also demonstrates FSD Africa's commitment to only doing business with those who are aligned with its stance and conveys measures FSD Africa has put in place to mitigate the risk of Modern Slavery.

2. Statement of the policy

Modern slavery is a crime and a violation of fundamental human rights. FSD Africa has a zero-tolerance approach to modern slavery. It is committed to acting ethically and with integrity in all 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 business or supply chain. FSD Africa expects the same high standards from all its contractors, suppliers and other business partners.

3. Scope of the policy

This policy applies to:

- All staff contracted by FSD Africa and its subsidiary FSD Africa (Investments) Ltd (together with FSD Africa) engaged in procurement-related activities.
- Associated personnel engaged with, or working or acting on behalf of, FSD Africa, including but not limited to the following: partners, consultants, agents, vendors and/or contractors.

For the purpose of this policy, the above will be referred to as 'covered persons'.

4. Definition of terms

Modern slavery is depriving a person of freedom for commercial gain in violation of fundamental human rights. It describes situations where offenders use coercion, threats or deception to exploit victims and undermine their independence. Modern slavery encompasses the following forms of severe exploitation:

- a) Trafficking persons - arranging or facilitating the travel of another person to exploit them.
- b) Slavery - owning someone like a piece of property
- c) Forced and compulsory labour - where one or both people do not or cannot consent to the marriage, and pressure or abuse is used to force them into the marriage
- d) Servitude - for example, significantly restricting a person's freedom and forcing them to work, or domestic servitude;

Modern slavery does not include practices like substandard working conditions or underpayment of workers.

5. Modern slavery statement

To demonstrate its commitment to this policy, the board of FSD Africa shall provide a public statement outlining its efforts to combat modern slavery in its supply chain each financial year.

6. Mitigation measures

FSD Africa's approach to combating the risk of modern slavery includes:

- a) Implementing a robust due diligence process for third parties such as grantees, consultants and significant suppliers
- b) Putting in place policies and procedures that mitigate the risk, such as procurement, recruitment, and the code of conduct
- c) Incorporating risk identification and assessments for modern slavery risks in its day-to-day operations
- d) Training and awareness sessions
- e) Including the prohibition of modern slavery practice within its agreements and contracts with all parties
- f) Setting up suitable mechanisms to report and respond to modern slavery concerns

7. Communication and awareness

FSD Africa shall provide training to its staff on modern slavery and related risks within its operations. In addition, FSD Africa will communicate the contents of this policy to enhance the awareness of

modern slavery.

8. Third parties' obligations

Third parties must adhere to FSD Africa's zero-tolerance approach to modern slavery.

Third parties working with FSD Africa must also assess the risk of modern slavery within their operations and formulate suitable mitigation measures. , they must also ensure that their staff are aware of this policy and stance.

They must report back to FSD Africa identified policy breaches connected to FSD Africa operations.

FSD Africa has put in place a third-party code of conduct that includes prohibitions to modern slavery.

9. Non-compliance with this policy

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

FSD Africa may terminate its relationship with individuals and organisations working on our behalf if they breach this policy.

10. Reporting modern slavery concerns

Any person with a reasonably held suspicion of modern slavery practices should discuss the concerns at the earliest possible instance with the **Director of Corporate Services** or make a disclosure through the FSD Africa Whistleblower hotline:

- By email at FSDAfrica@tip-offs.com, or
- By calling FSD Africa's free hotline: 0800 722 626 (call from a Safaricom line - available in Swahili and English) or international hotline +27315715260. The hotline is available 24 hours a day and 7 days a week.

If there is immediate danger, please inform the police.

It is important to consider that some actions can put a potential victim at risk and therefore the situation must not be tackled by yourself.

11. Responsibilities for FSD Africa personnel

- a) All staff
Staff must:
 - i. comply with this policy and reasonable requests regarding FSD Africa's modern slavery procedures;
 - ii. report reasonably suspected cases of modern slavery;
 - iii. participate in modern slavery training;
- b) The Board
The Board retains ultimate responsibility for ensuring the efficient implementation of this policy across FSD Africa.
The Board is responsible for preparing the annual Modern Slavery Statement, supported by the Director of Corporate Services
- c) Management
Managers are responsible for conducting appropriate due diligence as well as identifying and assessing the risks of modern slavery within their operations.
- d) Procurement personnel
Procurement personnel responsible for overseeing sourcing activity, ensuring that an assessment of suppliers is conducted (where appropriate) on their compliance with this policy.
- e) Human resources personnel
Human resources personnel are responsible for addressing modern slavery risks in the recruitment process, particularly when outsourcing recruitment to consultants and agencies for personnel recruitment, contract workers, consultants, casual workers, and interns.

12. Independent assurance

All FSD Africa operations are subject to independent external audits. FSD Africa commits to having independent assurance over the effective implementation of this policy carried out as part of the internal audit function.

13. Related documents

This policy should be read with related policies such as:

- a) The Code of Conduct
- b) Supplier code of conduct
- c) Environmental and Social, and Governance Impact policy
- d) Whistleblowing policy
- e) Anti-corruption policy
- f) Safeguarding policy
- g) Recruitment policy
- h) Procurement policy
- i) Due diligence policy

14. Document approval

The Director of Corporate Services is responsible for updating this policy and supplementing procedures manuals. The Finance and Risk Committee will approve the policy, which will be reviewed and updated biennially.