

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. POLICY STATEMENT

1.1 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 include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.2 The goal of this policy is to outline 20Robots Technologies' (company's) position on modern slavery. Our company has a zero-tolerance policy for modern slavery in its operations and supply chains.

1.3 This policy applies to all members of the company, and to all:

(a) persons working for or on behalf of the company in any capacity, including all employees, directors, volunteers, interns and agents and

(b) contractors, external consultants, agencies, third-party representatives, and business partners (“Suppliers”). Where a Supplier has its own modern slavery policy, we expect the Supplier to adhere to that policy.

1.4 20Robots Technologies is committed to:

(a) acting ethically and with integrity in all our business dealings and relationships;

(b) our performance indicators do not put pressure on or influence any risk of modern slavery by negotiating set performance targets

(c) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and

(d) maintaining consistency and openness in our approach to combating modern slavery in our company and supplier networks.

1.5 We expect the same high standards from all our Suppliers. As part of our contracting discussions, we include specific prohibitions against modern slavery, and we expect that our Suppliers will hold their own suppliers to the same high standards.

1.6 Our company specifically prohibits the compulsory overtime, child labour, discrimination, confiscation of identification documents and any act which may directly or indirectly impede freedom of movement, freedom of association, or the freedom of a worker to terminate their employment with the company.

1.7 We ensure that our working methods are compliant with the 2010 Equality Act and all applicable employment laws. We do not participate in forced or involuntary labor and have a zero tolerance policy for it, which implies that none of our suppliers engage in such behavior.

1.8 In line with these commitments, we support the United Nations Declaration on Human Rights and the International Labour Organization's core labour standards on forced labour, child labour, freedom of association and discrimination.

2. IDENTIFYING MODERN SLAVERY

2.1 Modern slavery may be found in our business, our supply chains, and outsourced activities.

2.2 There is no typical victim of modern slavery, and some victims do not understand they have been exploited or that they are entitled to help and support.

General indicators for modern slavery:

- Distrustful of authorities
- Expression of fear or anxiety
- Signs of psychological trauma (including post-traumatic stress disorder)
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Evidence of control over movement, either as an individual or as a group
- Found in or connected to a type of location likely to be used for exploitation
- Restriction of movement and confinement to the workplace or to a limited area
- Passport or documents held by someone else
- Lack of access to medical care
- Limited social contact / isolation
- Limited contact with family
- Signs of ritual abuse and witchcraft
- Substance misuse
- Person forced, intimidated, or coerced into providing services
- Doesn't know home or work address
- Perception of being bonded by debt
- Money is deducted from salary for food or accommodation
- Threat of being handed over to authorities
- Threats against the individual or their family members
- Being placed in a dependency situation
- No or limited access to bathroom or hygiene facilities
- Self identifies as a victim.

Forced labour

- No or limited access to earnings or labour contract
- Excessive wage reductions, withholding wages, or financial penalties
- Dependence on employer for several services for example work, transport and accommodation
- Any evidence workers are required to pay for tools, food or accommodation via deductions from their pay
- Imposed place of accommodation
- Found in poor living conditions
- Evidence of excessive working days or hours
- Deceived about the nature of the job, location, or employer
- Employer or manager unable to produce documents required when employing migrant labour
- Employer or manager unable to provide record of wages paid to workers
- Poor or non-existent health and safety equipment or no health and safety notices.

A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

3. TRAINING

3.1 An online anti-slavery training module is available to all 20Robots Technologies

3.2 This policy is discussed during the onboarding training sessions.

4. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE

4.1 The Management Board has overall responsibility for ensuring this policy complies with the company legal and ethical obligations.

4.2 The Head of People has the primary responsibility for implementing this policy, and for dealing with any queries about it.

4.3 All 20Robots Technologies members must comply with this policy.

4.4 Each Supplier must comply with this policy, or its own anti-slavery policy.

5. REPORTING MODERN SLAVERY

5.1 20Robots Technologies members and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:

(a) if you are member, your Line Manager;

(b) if you are a Supplier, your primary account manager or business contact with 20Robots Technologies;

(c) if you are a member of 20Robots Technologies or a Supplier who wishes to remain anonymous, please send an email to ciprian.caprioara@20robots.tech, and your report will be handled in accordance with Romanian law.

6. PUBLICATION OF THIS POLICY

6.1 This policy is available to 20Robots Technologies members on the 20Robots Technologies confluence page under the name ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY.

6.2 This policy is available to Suppliers on the company website

www.20Robots

7. BREACHES OF THIS POLICY

7.1 If a member of 20Robots Technologies breaches this policy, he or she may face disciplinary action, which may include dismissal for misbehavior or serious misbehavior.

7.2 A relevant member of the board may terminate its relationship with a Supplier if it is in breach this policy. Alternatively, the relevant member of the board may elect to work with the Supplier to resolve such issues.

8. POLICY REVIEW

8.1 Head of People, is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice.

8.2 This policy is not included into any employment contract and may be modified at any moment.

8.3 Members of 20Robots Technologies are invited to provide feedback on this policy and to propose ways to strengthen our anti-slavery efforts by contacting Head of People with their suggestions.

8.4 This policy was last updated January 10, 2022 and will be reviewed January 10, 2023.