

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

(Gemini Agriculture Ltd ("the company")

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, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 We have, and expect our Members to have, a zero-tolerance approach to modern slavery and we are committed to ensure that we and our Members act ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within the industry or in any supply chains.
- 1.3 Any Member or employee of the Company who breaches this policy will face disciplinary action, which could result in membership or employment termination.
- 1.4 We may amend this policy at any time and it will be reviewed regularly. It does not form part of any employee's contract of employment.
- 1.5 We expect each Member to ensure that all persons working for them or on their behalf in any capacity (including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners) comply with the provisions of this policy.

2. ABOUT THIS POLICY

- 2.1 The prevention, detection and reporting of modern slavery in any part of business or supply chain is the responsibility of all those working within our industry or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 2.2 We are committed to ensuring there is transparency within our Company and 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 Members, and their contractors, suppliers and other business partners, and as part of our contracting processes we expect our Members to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our Members will hold their suppliers to the same high standards.
- 2.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of your business or supply chains of any supplier tier at the earliest possible stage.



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