

MODERN SLAVERY POLICY

Policy POL 09.06

Version 1.0

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ABSTRACT

Modern slavery is a crime and a violation of fundamental human rights and takes various forms such as slavery, servitude, forced and compulsory labor 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. Any reference in this Policy to 'modern slavery' should be understood as a reference to modern slavery, human trafficking or any other activity outlawed by the Modern Slavery Act 2015 of the UK Government.

PURPOSE

The aim of the Policy is to define the guiding principles, responsibilities and actions for preventing and reporting modern slavery in any part of our business or supply chains.

SCOPE

This Policy applies to all CRIF Group companies.

USERS

These principles and provisions are applicable to CRIF Group, defined as CRIF S.p.A. and other Italian and foreign companies controlled by it and related to it (herein also referred to as **CRIF** or **Company**), and shall be binding for CRIF directors, for all CRIF employees and those who work for CRIF, whatever the employment relationship, including temporary employees, contractors, suppliers and interns/trainees (herein also referred to as **Recipients**).

CRIF COMMITMENT AGAINST MODERN SLAVERY

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 CRIF Group or companies under its control.

All Recipients are required to avoid any activity that might lead to a breach of this Policy and if they believe or suspect that a breach of this Policy has occurred or may occur in the future, they must notify the HR Dept., for example, by writing to the relevant HR Business Partner, and report the situation to their manager or the relevant contact person within CRIF Group as soon as possible.

Recipients are expected and encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the CRIF business or supply chains of any level of supplier at the earliest possible opportunity (including if they are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitute any of the various forms of modern slavery).

CRIF Group encourages openness and will support anyone who raises genuine concerns in good faith under this Policy and is committed to ensuring that no one suffers any detrimental treatment (including dismissal, disciplinary action, threats or other unfavorable treatment) as a result of reporting in good faith their suspicion that modern slavery in any form is or may be taking place.

CRIF Group has a zero-tolerance approach to modern slavery. If CRIF becomes aware of an event that is in actual or potential conflict with this Policy, it will initiate an investigative procedure, including with the help of third parties, which may result in the termination of any contractual relationship and reporting to the competent authorities, if the conditions apply.

Suppliers are required to expressly sign this Policy or to demonstrate that they have a similar policy that guarantees the same level of protection against any act that may fall within the definition of modern slavery.

INFORMATION AND COMMUNICATION

In order to ensure the correct understanding of this Policy, CRIF is committed to bringing the Modern Slavery Policy to the attention of internal and external Recipients through communication activities (e.g., posting on the Company notice board, sending to all employees, posting on the intranet and/or the Company website, sending to contractors, etc.).

DEFINITIONS

Slavery and servitude: when people are dehumanized, treated as a commodity, bought or sold as “property”, have restrictions placed on their freedom or are generally exploited for someone else’s gain. Slavery often involves Forced or Compulsory Labor.

Forced or Compulsory Labor: when someone is forced to work, or is otherwise controlled by an “employer”, through coercion, mental or physical abuse, or the threat of abuse.

Human trafficking: relates to arranging or facilitating the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

REFERENCES

Modern Slavery Act 2015 of the UK Government

REVISION HISTORY

Version	Revision Date	Description	Approver Name
1.0	27/04/2023	First release	