

MODERN SLAVERY POLICY

Policy name	Modern Slavery Policy
Responsibility	CEO

1. Policy Statement

1.1. Eulogy is committed to upholding the rights and obligations associated with anti-slavery and human trafficking. Eulogy does not tolerate and will not support any business either as a client or a supplier which directly or indirectly contributes to the practice of human slavery or human trafficking in any way.

2. Policy Objective

2.1. Our anti-slavery policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and reflects our aim to act transparently, respectfully and with integrity in all our business relationships. We do not tolerate slavery or human trafficking in any part of our business and are committed to ensuring that it does not take place in our supply chains. We implement and enforce effective systems and controls to mitigate this risk.

3. Our Supply Chains

3.1. We have reviewed our purchases to understand the nature of our suppliers. These include freelancers, consultants and companies providing a wide range of goods and services to help us deliver our aims and objectives for our businesses and those of our clients.

4. Risk Assessment and Due Diligence Processes for Slavery and Human Trafficking

4.1. We have in place systems to mitigate the risk of slavery and human trafficking occurring in our supply chains, allowing us to assess, identify, address and monitor risk areas. We assess the risk of slavery or human trafficking occurring in our supply chains and apply enhanced checks where higher-risk areas are identified.

4.2. As part of our risk management process, we asked all heads of department to carry out a risk assessment to consider any existing or future arrangements with third parties. This included identification of:

4.2.1. All agencies we use to provide staff or services, where there is a heightened risk of poor practice, particularly where they employ non-UK nationals or in light of the services the staff are asked to provide;

4.2.1.1. Suppliers whose work involves a high level of physical labour; and

4.2.1.2. Relationships involving suppliers operating outside the UK, in countries where controls on employment practices may be weaker.

4.3. We assessed the responses and identified risk areas so that we could review those relationships in more detail.

4.4. We will carry out risk assessments for new suppliers to consider the likelihood of maltreatment of staff or other unsatisfactory factors. This may mean that we decide not to

work with them or seek further information, or assurances, before proceeding. For new suppliers where a higher risk is identified:

- 4.4.1. If the supplier is required to comply with the Modern Slavery Act 2015, we will review their own published policies on modern slavery.
- 4.4.2. For other suppliers, we will seek declarations that they meet appropriate requirements and may ask them to give information on their working practices.
- 4.4.3. We will apply appropriate vetting procedures, based on the level of risk identified, to ensure we are comfortable that any risks involving slavery can be identified and addressed promptly.

5. Supplier Adherence to Our Policy

- 5.1. To ensure all those in our supply chain and contractors comply with our policy, we have in place a supply chain compliance programme. This consists of contractual warranties in our agreements with suppliers and other measures as are appropriate for that business.

6. Raising Awareness

7. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide updates to our staff via our own internal and communications programmes about the elements of best practice.