K2 Group

Anti-Slavery and Human Trafficking Policy

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Table of Contents

Anti-Slavery and Human Trafficking Policy	3
Introduction	3
Scope	3
Our Approach	4
Responsibilities	4
Preventive Measures	4
Transparency	5
Our Staff	5
Our Suppliers	5
Anti-Slavery Statement	5
Compliance	5
Reporting	6
Communication of this Policy	6
Violations	7

Anti-Slavery and Human Trafficking Policy

Introduction

K2 Group is a globally operating organisation with group companies in numerous countries. We as a group value human rights and are committed to ensuring that all business is conducted according to ethical, professional, and legal standards in a fair, honest, and open manner.

To maintain our reputation and establish lasting confidence in our business, we made it our mission at K2 to ensure compliance in all areas of our business and supply chain. The Modern Slavery Act 2015 is an Act of Parliament of the United Kingdom and applies to K2 (collectively, "K2", "us", "we") in the UK; however, as a group taking up global responsibility, we have taken the decision to apply the same principles for internal and supplier controls for all our operations worldwide.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

• slavery, servitude (coercing someone to provide services) and forced and compulsory labour;
• human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
• committing any offence with the intention to commit human trafficking;
• aiding, abetting, counselling, or procuring any of the above offences;

all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

With this policy K2 seeks to raise awareness for modern slavery within the organisation and our supply chain to prevent the intentional or unintentional enabling, promotion or toleration of any of its forms in our operations or the activities of any supplier.

As a group, we believe in the supreme value of individual freedom as a human right and the base for prosperity of the global economy.

Scope

This Modern Slavery Policy (Policy) applies to all directors, management representatives, head of departments, officers, external contractors, interns, employees, suppliers, and business partners (collectively "you") of K2 who are engaged with any company within the K2 Group. This Policy should also be read in conjunction with any other applicable K2 policies and guidelines such as the Employment Handbook, the Code of Business Conduct and Ethics (the Code) or

the Supplier Code of Conduct which serve as a guide on how to represent K2 and how to ensure ethical behaviour in line with K2's rules of conduct.

Our Approach

Zero tolerance approach to slavery and human trafficking

K2 has a zero-tolerance approach to all forms of modern slavery and human trafficking within our operations and within our supply chain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place within our sphere of action.

Responsibilities

The K2 Board internally and our suppliers and business partners externally have overall responsibility for ensuring this Policy complies with and is embedded in our and their legal and ethical obligations and that all those within our and their control and influence comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given appropriate training on it and the issue of modern slavery and human trafficking in supply chains. All staff are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Legal Department in your region.

Preventive Measures

The K2 Board are committed to this Policy and have diligently put measures in place that are designed to prevent and detect modern slavery and human trafficking within our business and the supply chain.
Our suppliers and business partners are expected to take measures adequate to the ones outlined subsequently.
Our preventive measures in this regard contain the following elements:
1. A policy which articulates our commitment to prevent violations of the Modern Slavery Act 2015 within our operations and supply chain, being this Policy;
2. Communication of this Policy and all relevant elements of the programme to all staff and to our business partners and suppliers;
3. The assessment of modern slavery and human trafficking risks within K2 and our supply chain and the development of effective, efficient, and transparent controls to reduce exposure to those risks;
4. The adoption of anti-slavery wording in contracts;
5. The adoption of appropriate due diligence on business partners, agents, contractors, consultants, subcontractors, and suppliers coupled with a requirement that they implement

procedures which incorporate the principles of the Modern Slavery Act 2015; and
6. Training of all relevant individuals throughout K2 so that compliance with our policies and procedures is the duty of all relevant staff at all levels and so that individuals can recognise modern slavery practices and take steps to avoid them.

Transparency

K2 is devoted to providing for transparency throughout our dealings and to ensure that our zero tolerance approach to modern slavery trickles down into our supply chain. All our actions are to be consistent with the disclosure obligations under the Modern Slavery Act. We expect for our business partners and suppliers to establish the same.

Our Staff

In addition to the above, K2 provides safe and fair working conditions for all its employees and external staff and ensures that no child labour is employed, in line with minimum age laws, within the countries in which we operate. No force, coercion or other means of pressure are to be used against any person engaged with K2.

Our suppliers and business partners must provide the same level of protection within their business.

Our Suppliers

K2 expects the same standards from all its contractors, suppliers, and other business partners and as part of its contracting processes, includes 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 suppliers will hold their own suppliers to the same standards. Please refer to K2's Supplier Code of Conduct in this regard.

Anti-Slavery Statement

Pursuant to section 54 of the Modern Slavery Act 2015, the K2 Board commits to publishing a public statement annually, setting out the steps it has taken during that particular financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or within its own business.

Compliance

Anyone working on K2's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives, business partners and suppliers must read, understand,

and comply with this Policy, the Staff Code of Conduct, or our Supplier Code of Conduct.

The prevention, detection and reporting of modern slavery in any part of K2's operations and supply chains is the responsibility of all those working for us or within our sphere of control.

Those working for or engaged with K2 are required to avoid any activity that might lead to, or suggest, a breach of this Policy. You should notify the Legal Department under legalcompliance@k2partnering.com, your line manager or point of contact at K2 as soon as

possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future. Staff are encouraged to raise concerns about any suspected or existing modern slavery related incidents in any parts of our supply chains in any supplier tier at the earliest possible stage. It is compulsory that modern slavery aspects are considered when choosing any local suppliers including services such as cleaning, catering, or security.

Reporting

Internal reporting is crucial to our success at fighting and preventing modern slavery and it is both expected and valued.

Staff are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that they become aware of. Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in "good faith". If a member of staff believes that a breach of this Policy has occurred or is likely to occur, they must notify a Board member, their line manager and the Legal Department as soon as possible.

If the staff member is unsure or in doubt about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitute any of the various forms of modern slavery, this should still be raised with their line manager and the Legal Department.

K2 aims to encourage speaking-up and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If any staff member believes that they have suffered any such treatment, they should inform our Legal Department immediately.

Communication of this Policy

Training and communication on this Policy and on the risk our business faces from modern slavery from within our supply chain will be provided. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Violations

Any staff who breaches this Policy by engaging in or conspires to engage in any modern slavery conduct or human trafficking will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and if warranted legal proceedings may be brought against you. K2 may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this Policy and will report any violations to the local authorities.

If our reputation suffers because of any individual's or organisation's violation of this policy, K2 will seek legal compensation.