ThinkSono Ltd

Anti-Slavery and Human Trafficking Policy

Policy owner: Chief Executive Officer | Version 1.0 | Approved: 30 October 2026 | Review: annually

1. Purpose and scope

This policy sets out ThinkSono Ltd's ("ThinkSono", "the Company") principles and commitments for preventing modern slavery and human trafficking in its own business and in its supply chains. It applies to all directors, employees, contractors, consultants and agency workers engaged by the Company, and sets out the standards we expect of our suppliers and business partners. It supports the Company's published Modern Slavery and Human Trafficking Statement.

2. Our principles

ThinkSono has a zero-tolerance approach to modern slavery in all its forms, including slavery, servitude, forced or compulsory labour, child labour, debt bondage and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and to implementing proportionate controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

3. Our commitments

- **Our own workforce.** All employees and direct engagements are subject to right-to-work verification, written contracts, and pay at or above the applicable statutory minimum. No worker is required to lodge deposits or identity documents with the Company, and all workers are free to leave their employment on reasonable notice.
- **Labour standards.** We adhere to all applicable local and national employment and human rights laws. We prohibit any threat of violence, harassment or intimidation; compulsory overtime; discrimination on any protected ground; and the confiscation of workers' original identification documents. All workers enjoy freedom of movement and freedom of association, including the right to join a trade union or other form of worker representation. We expect the same standards of our suppliers.
- **Recruitment.** We recruit directly or through reputable agencies operating in well-regulated jurisdictions. We do not charge recruitment fees to workers and we will not engage any labour provider that does so.
- **Suppliers.** We favour suppliers operating in well-regulated sectors and jurisdictions. Suppliers are expected to comply with all applicable anti-slavery laws, to apply equivalent standards in their own supply chains, and to confirm this when requested. Engagements involving physical-goods manufacturing, component sourcing or outsourced labour are subject to enhanced scrutiny before approval under our quality management system.
- **Contractual terms.** Where relevant to the nature and scale of the engagement, our supplier terms require compliance with the Modern Slavery Act 2015 and permit termination where a supplier is found to be in breach.

4. Responsibilities

- **The Board of Directors** has overall responsibility for this policy, approves the Company's annual Modern Slavery Statement, and reviews this policy at least annually.
- **The Chief Executive Officer** is the policy owner, is responsible for its implementation, and is the point of escalation for any concern raised.
- **Those responsible for procurement, operations and people management** must apply this policy when onboarding staff, contractors and suppliers.
- **All workers** are responsible for reading, understanding and complying with this policy and for reporting any concern.

5. Communication and training

This policy is provided to all new starters as part of onboarding and is covered in the Company's annual compliance communications. Staff in procurement, operations and people-management roles receive additional guidance on identifying and escalating modern slavery risks. Training and capacity-building will be expanded proportionately as the business grows.

6. Reporting concerns

Any employee, contractor, supplier or other third party who suspects that modern slavery or human trafficking may be taking place in our business or supply chains should report it as soon as possible to the Chief Executive Officer, or, where this is not appropriate, to any other director. Reports may be made confidentially and are handled under the Company's Whistleblowing Policy. No one will suffer any detriment for raising a concern in good faith, even if it proves to be unfounded.

7. Response to reports

All reports will be acknowledged promptly and investigated by a director not involved in the matter. Where a concern is substantiated, the Company will take appropriate action, which may include supporting affected workers, notifying the relevant authorities, requiring corrective action from a supplier, or terminating the relationship.

8. Monitoring and review

The Company monitors the effectiveness of this policy on a proportionate basis against the following indicators: the number of reported or substantiated concerns (target: zero); completion of right-to-work verification for all staff and direct engagements; completion of modern slavery checks or confirmations for higher-risk suppliers; and staff awareness of this policy and the reporting channel. Outcomes are reported in the Company's annual Modern Slavery Statement.

9. Breaches

Any employee who breaches this policy may face disciplinary action, up to and including dismissal. The Company may terminate its relationship with any supplier, contractor or business partner who breaches this policy.

10. Approval

This policy has been reviewed and approved by the Board of Directors of ThinkSono Ltd.

Signed: Fouad Al Noor

Fouad Al Noor
Chief Executive Officer and Director, for and on behalf of the Board of ThinkSono Ltd
Date: 30 October 2026