

# **Anti-Slavery & Anti-Human Trafficking Policy**

## **KOKO Networks**

Global Policy  
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Policy Owner: Chief People Officer



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## INTRODUCTION

This Policy applies to 1) KOKO Networks Limited (Mauritius), 2) KOKO Networks Limited (Kenya), 3) KOKO Networks Private Limited (India), 4) KOKO Networks Uganda Limited, 5) KOKO Networks Rwanda Limited, 6) Saarus Innovations Private Limited (India), 7) KOKO Networks (UK) Limited, 8) KOKO Networks Global Services (Kenya) Limited, and any other KOKO Group subsidiaries that may be incorporated in the future. Together, we will refer to these as “KOKO Networks” or the “Company.”

All Company Employees are responsible for reading, understanding, and complying with the provisions of this Manual. If anything needs to be clarified, please reach out to your Line Manager. If you have additional questions, please reach out to a member of the People department.

## HUMAN RIGHTS POLICY

At KOKO Networks, we are unwavering in our dedication to uphold and advance internationally recognized human rights in all facets of our business operations. We are committed to cultivating an inclusive and diverse workplace that respects each individual's inherent dignity and value. Our comprehensive Human Rights Policy aligns with international conventions on human rights and follows the following principles:

**Non-Discrimination:** We strictly prohibit discrimination of any kind, including but not limited to discrimination based on race, color, religion, gender, sexual orientation, gender identity or expression, national origin, disability, age, or any other protected status defined by applicable laws.

**Equal Opportunity:** KOKO Networks is devoted to providing equal opportunities for all Employees, from recruitment and training to promotion and compensation. We aim to foster an environment where merit and performance are the primary factors for career progression.

**Diversity and Inclusion:** We embrace diversity, recognizing that a diverse and inclusive workplace enhances innovation, creativity, and productivity. We strive to create an environment that values individuals with diverse backgrounds, perspectives, and experiences.

**Harassment-Free Environment:** KOKO Networks dedicates itself to maintaining a workplace free from harassment, bullying, or intimidation. Harassment based on race, gender, sexual orientation, or any other protected characteristic is strictly prohibited.



**Employee Rights:** We respect the rights of our Employees to voice concerns without fear of retaliation. We provide a fair and respectful mechanism for Employees to address grievances.

**Child Labor and Forced Labor:** KOKO Networks unequivocally condemns any form of child labor or forced labor in our operations or supply chain. We adhere to all relevant laws and international standards concerning labor rights.

**Community Engagement:** We acknowledge our responsibility to the communities in which we operate and strive to contribute positively to social development. We respect the rights and cultures of local communities and actively engage with them in a meaningful and mutually beneficial manner.

**Environmental Sustainability:** KOKO Networks is committed to minimizing its environmental impact, recognizing the importance of sustainability in our operations.

**Transparency and Reporting:** We commit to transparently communicating with stakeholders about our efforts, progress, and challenges, including regular reporting through annual reports.

**Risk Assessment and Due Diligence:** KOKO Networks will actively identify and assess human rights risks within our operations and supply chain.

**Continuous Improvement:** We commit to regularly reviewing and enhancing our human rights policies and practices, demonstrating our dedication to constant improvement.

**Alignment with International Standards:** We endorse the principles contained in the following international human rights instruments and actively commit to complying with the applicable laws

- The International Bill of Human Rights
- The International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work
- National Constitutions, laws, and regulations on human rights

KOKO Networks recognizes that achieving these standards presents unique challenges. However, we commit to adopting these with respective stakeholders within our business operations.

Failure to observe the Policy by any Employee of the Company will lead to disciplinary action, as detailed in our Policy and Procedures Manual.

## ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING POLICY

At KOKO Networks, we are committed to conducting our business ethically and with respect for human rights. This Anti-Slavery and Human Trafficking Policy reflects our dedication to preventing and addressing these heinous practices within our operations and supply chain. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our business operations.

### 1. Policy Statement

#### **Prohibition of Slavery and Human Trafficking:**

- KOKO Networks strictly prohibits all forms of slavery and human trafficking within our operations, supply chain, and business relationships.
- We uphold the principles of freedom, dignity, and human rights for all individuals.

#### **Supply Chain Responsibility:**

- We expect our suppliers and business partners to adhere to similar anti-slavery and human trafficking standards.
- KOKO Networks conducts due diligence on suppliers to assess compliance with these standards and actively collaborates to address identified risks.

#### **Compliance with Laws:**

- KOKO Networks complies with all applicable anti-slavery and human trafficking laws, including the UK Modern Slavery Act and other relevant international legislation.

#### **Risk Assessment and Mitigation:**

- We conduct regular risk assessments to identify and mitigate potential risks of slavery and human trafficking in our operations and supply chain.
- If we identify risks, we promptly implement appropriate measures to address and rectify the situation.

### 2. Communication and Reporting

#### **Internal Communication:**

- This policy is communicated to all Employees to ensure a shared commitment to preventing slavery and human trafficking.
- We will continue to evaluate, review, and update this policy to reinforce our collective responsibility in upholding these principles.

#### **Reporting Mechanisms:**

- KOKO Networks provides clear and accessible reporting mechanisms for Employees to report any concerns related to slavery and human trafficking.



- We encourage Employees to report any concerns or suspicions through established reporting channels without fear of reprisal and in accordance with our Whistleblowing Policy, which Employees can find in KOKO's Policy and Procedures Manual.
- We thoroughly investigate reports and take appropriate actions in response.

Failure to observe this Policy by any Employee of the Company will lead to disciplinary action, as detailed in our Policy and Procedures Manual.