

Modern Slavery Policy

Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Tuff¹ has a zero-tolerance approach to modern slavery, and 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 is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our own business and in our approach to tackling modern slavery across our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, and other business partners, and from our contracting processes.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility for the policy

Tuff has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

Tuff has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with any queries about it.

All Tuff employees and consultants are invited to comment on this policy and suggest ways to improve it.

Compliance with the policy

All employees and consultants must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business, supply chains, clients or partners is the responsibility of all those working for us or under our control. You are required to avoid any activity that might

¹ For the purposes of this Tuff Leadership Training UK Ltd and Tuff Ledarskapsträning Stockholm AB and both referred to as 'Tuff'

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lead to or suggest a breach of this policy. You must notify someone in a position of responsibility as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they are mistaken.

We are committed to ensuring no one suffers any detrimental treatment due to reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any other business we work with. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Communication & awareness of this policy

All employees and contractors are aware of this policy, and it will be reviewed and communicated regularly.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, including dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.