



Modern Slavery and Human Trafficking Policy

LOKR Sports Ltd

Last updated: 28 April 2026

Document Control

Policy Owners: CEO

Approval Date: 01/08/2024 \ **Effective Date:** 01/08/2024 \ **Review Date:** October 2026

Note: This policy must be reviewed annually or when significant changes occur to ensure its continued relevance and effectiveness.

- **01/08/2024** (v1.0, Claire Robinson) Create formalised Modern Slavery Policy based on existing Modern Slavery Statement
- **10/08/2025** (v1.1, Claire Robinson) Annual Review
- **08/10/2025** (v1.2, Claire Robinson) Updates for LOKR

1. Introduction

This policy outlines LOKR Sports Ltd (LOKR)'s commitment to preventing modern slavery and human trafficking in our organisation and supply chains. We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery.

2. Scope

This policy applies to all employees, contractors, suppliers, and other third parties working with or on behalf of our organisation. It encompasses all activities conducted by our organisation and extends to our entire supply chain. The policy is relevant to all geographical locations in which we operate, and to all sectors and industries in which our organisation is involved.

3. Policy Statement

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- **Zero-Tolerance Approach:** We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.

- **Responsibility:** The prevention, detection, and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.

- **Stakeholder Engagement:** We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

- **Contracting Processes:** We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

4. Compliance Measures

Consistent with our risk-based approach we may require:

- **Third Party Compliance:** Employment and recruitment agencies and other third parties that supply workers to our organisation will be required to confirm their compliance with this policy.
- **Supplier Compliance:** Where suppliers engage workers through a third party, they must ensure that the third party agrees to comply with this policy.

As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us to carry out audits of suppliers for their compliance with our policy. If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

5. Responsibility

- **Board of Directors:** The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- **Chief Executive Officer (CEO):** The CEO has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries regarding its interpretation.
- **Management:** Management at all levels are responsible for ensuring those who report to them is made aware of and understand this policy and are given adequate training on it.

6. Enforcement:

All employees, contractors, and suppliers are expected to comply with this policy. Non-compliance may result in disciplinary action or termination of contracts, depending on the nature and severity of the breach. Persistent or deliberate breaches may be escalated to the Board for further action. LOKR reserves the right to audit compliance and require corrective measures where deficiencies are identified.

7. Review

All policies are reviewed on an annual basis automatically. Additional specific criteria for review include:

- Changes to local or national policy or service provision or legislation
- Incidents prompting policy review (e.g., where policy was not followed, or proved inadequate)