



ATERIAN PLC  
("Aterian" and/or the "Company")

### Human Rights and Modern Slavery Policy

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	Title: Executive Chairman, Aterian PLC		
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## **1. INTRODUCTION**

Aterian plc (“Aterian”) is committed to upholding the principles of human rights, ethical business practices, and social responsibility. This Modern Slavery Policy outlines Aterian's commitment to preventing and addressing modern slavery and human trafficking in all its operations, including its African business activities. Aterian recognizes that modern slavery is a global issue and is dedicated to taking proactive steps to combat it.

## **2. POLICY STATEMENT**

Aterian plc has a zero-tolerance approach to modern slavery and human trafficking. The company is committed to ensuring that its operations and supply chains are free from any form of modern slavery, including forced labour, child labour, human trafficking, and other exploitative practices. Aterian will act transparently, responsibly, and in full compliance with applicable laws and regulations relating to modern slavery.

## **3. RESPONSIBILITIES**

3.1. Board of Directors: The Board of Directors holds ultimate responsibility for implementing and effectively implementing this Modern Slavery Policy. They are responsible for providing the necessary resources, establishing policies and procedures, and overseeing the management's efforts to combat modern slavery.

3.2. Employees and Stakeholders: All employees, contractors, suppliers, and stakeholders are required to act in accordance with this policy and report any suspected instances of modern slavery promptly. They are responsible for supporting and cooperating with Aterian's efforts to combat modern slavery within their respective roles.

## **4. RISK ASSESSMENT AND DUE DILIGENCE**

4.1. Risk Assessment: Aterian will conduct comprehensive risk assessments of its operations and supply chains to identify areas of potential exposure to modern slavery risks. This assessment will include considering factors such as geographic location, industry risks, and the nature of business activities.

4.2. Due Diligence: Aterian will implement robust due diligence processes to evaluate and monitor its suppliers, contractors, and business partners. This will involve assessing their commitment to combating modern slavery, reviewing their policies and practices, and establishing clear expectations for compliance.

## **5. SUPPLIER CODE OF CONDUCT**

Aterian will establish and communicate a Supplier Code of Conduct that outlines the company's expectations regarding modern slavery and ethical business practices. Suppliers and contractors will be required to adhere to this code, ensuring that they do not engage in any form of modern slavery or human trafficking.

## **6. TRAINING AND AWARENESS**

Aterian will provide regular training and awareness programs for its employees and stakeholders to ensure they understand the risks associated with modern slavery and are equipped to identify and report any suspicions. Training will emphasize the importance of ethical conduct, human rights, and responsible supply chain management.

## **7. REPORTING MECHANISM AND WHISTLEBLOWING**

Aterian will maintain a confidential reporting mechanism, such as a dedicated hotline or email address, for reporting concerns or suspicions of modern slavery. The company will protect whistleblowers from retaliation and ensure that all reported instances are promptly and thoroughly investigated.

## **8. COMPLIANCE MONITORING AND REVIEW**

Aterian will conduct regular audits and assessments to monitor compliance with this Modern Slavery Policy. The company may engage independent third-party experts to evaluate its efforts and provide recommendations for improvement. The policy will be reviewed periodically to ensure its continued effectiveness and alignment with evolving best practices and legal requirements.

## **9. COMMUNICATION AND COLLABORATION**

Aterian is committed to engaging and collaborating with relevant stakeholders, including industry peers, NGOs, and local communities, to combat modern slavery effectively. The company will communicate its commitment, progress, and challenges related to modern slavery openly and transparently.

## **10. CONSEQUENCES OF NON-COMPLIANCE**

Aterian takes non-compliance with this Modern Slavery Policy seriously. Any substantiated violation of the policy may result in disciplinary action, termination of contracts or relationships, and, if necessary, reporting to appropriate authorities.