

**Benevolent<sup>AI</sup>**

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**ANTI-SLAVERY AND HUMAN  
TRAFFICKING POLICY**

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**1. INTRODUCTION**

- 1.1 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 in order to exploit them for personal or commercial gain.
- 1.2 BenevolentAI (the “**Company**”) and its subsidiaries (together, the “**Group**”, “**we**”, “**us**” or “**our**”) have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or in any of its supply chains.
- 1.3 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 and the standards of ethical and responsible conduct set out in this anti-slavery and human trafficking policy (this “**Policy**”). We are also committed to comply with the relevant legal prohibitions related to fundamental human rights. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.4 This Policy applies to all individuals working for a Group company including all officers, consultants and employees (whether temporary or permanent) and whether on part-time or fixed-term contracts. All such persons are referred to in this Policy as “staff”. All third-party partners, suppliers, outsourced providers and appointed representatives of any Group company should have regard to the Policy, and are required to conduct themselves in a manner that is consistent with the requirements of this Policy.
- 1.5 This Policy is not contractual and does not form part of any employee’s contract of employment. We may vary or amend this Policy at its discretion and may apply it as far as practicable in the circumstances.

**2. RESPONSIBILITY FOR THIS POLICY**

- 2.1 The Board has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Compliance Manager has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and

auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 All staff are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Manager.

### **3. COMPLIANCE WITH THE POLICY**

3.1 All staff must ensure that they read, understand and comply with this Policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

3.3 All staff must notify the Compliance Manager or General Counsel as soon as possible if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future.

3.4 All staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If any member staff believes or suspects a breach of this Policy has occurred or that it may occur staff must notify the Compliance Manager or General Counsel as soon as possible.

3.6 If any member of staff is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, members of staff must raise it with their line manager or the Compliance Manager or General Counsel, as appropriate.

3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of 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 of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any member of staff believe that you have suffered any such

treatment, you should inform the Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure, which can be found on the Company intranet page, Confluence.

**4. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 4.1 Training on this Policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

**5. BREACHES OF THIS POLICY**

- 5.1 Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy.

**6. QUESTIONS AND FURTHER INFORMATION**

In case of any questions in relation to this Policy, please contact the Compliance Manager.

**Approved by the Board on 15 December 2023.**