COMPLIANCE

Modern Slavery and Human Trafficking Policy

Policy Owner: Paul Jones

Version: 1.0

Effective Date: 2026-02-24

Last Reviewed: 2026-02-24

1. Purpose

Crystal Project Inc. (“Crystal”) is committed to acting ethically and with integrity in all business dealings. This policy sets out Crystal’s approach to modern slavery and human trafficking and supports compliance with applicable modern slavery and human rights legislation, including the UK Modern Slavery Act 2015 and similar requirements in other jurisdictions.

2. Scope

This policy applies to:

- All employees of Crystal Project Inc.
- Contractors and consultants engaged by Crystal
- Our approach to third-party service providers and supply chain relationships

3. Policy Statement

Crystal does not use forced labour, child labour, bonded labour, or any form of involuntary servitude in its operations. We do not tolerate modern slavery or human trafficking in our business or supply chains.

All personnel are employed or contracted voluntarily and in compliance with applicable labour laws. We are committed to ensuring that our operations and supply chains are free from modern slavery and human trafficking.

4. Nature of Our Operations

Crystal operates as a fully remote software company. We provide a personality-based communication insights platform (Crystal Knows) and do not:

- Manufacture physical goods
- Operate facilities involving manual labour or on-site production
- Maintain a traditional supply chain for physical products

Our workforce is composed of knowledge workers who work remotely. Employment and contractor relationships are governed by written agreements and applicable employment law. This operational model significantly limits exposure to sectors or geographies where modern slavery risks are typically higher, but we nevertheless maintain the commitments set out in this policy.

5. Third Parties and Supply Chain

Where we engage third-party service providers (e.g. cloud hosting, SaaS tools, professional services), we expect them to comply with applicable labour and human rights laws.

Crystal conducts vendor due diligence in accordance with our **Third-Party Risk Management Policy**. For vendors that present material labour or supply chain risk, we may include appropriate representations or commitments regarding modern slavery and human rights in our evaluation and contracting processes.

We do not knowingly engage suppliers or partners that use forced labour, child labour, or other forms of modern slavery.

6. Due Diligence and Risk Assessment

We assess modern slavery and human rights risk in line with the nature and scale of our operations. Given our remote-first, software-only business model, we focus on:

- Ensuring our own employment and contractor practices comply with labour laws
- Incorporating modern slavery and human rights considerations into third-party risk reviews where relevant

- Responding to customer and stakeholder requests for transparency (e.g. questionnaires, contractual clauses)

We will review and enhance our due diligence processes as our operations or regulatory expectations evolve.

7. Training and Awareness

Personnel with responsibility for procurement, vendor management, or compliance are made aware of this policy and the importance of modern slavery and human rights in our third-party relationships. Additional training or communication may be provided as needed to support compliance and best practice.

8. Reporting and Escalation

Anyone with concerns about modern slavery or human trafficking in connection with Crystal's operations or supply chain may raise them through existing reporting channels, including management or designated compliance contacts. Reports will be taken seriously and addressed in accordance with our policies and applicable law.

9. Policy Review

This policy is reviewed periodically and updated as necessary to reflect changes in our operations, legal requirements, or best practice. The Policy Owner is responsible for ensuring the policy remains current and effective.

10. Related Documents

- **Third-Party Risk Management Policy** — Vendor due diligence and subprocessor management
- **Human Resource Security Policy** — Employment and contractor practices
- **Code of Conduct** — Standards of behaviour and ethical conduct

For further information or a statement tailored to specific legislation (e.g. UK Modern Slavery Act transparency statement), please contact security@crystalknows.com.