

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT & POLICY

1. PURPOSE AND APPLICATION OF THIS POLICY

- 1.1 OT Group Ltd is committed to combatting slavery, servitude, forced and compulsory labour, as well as human trafficking. In accordance with the Modern Slavery Act 2015, we have a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and transparently, and this document sets out our policy with the aim of the prevention of modern slavery or human trafficking within our business or supply chains.
- 1.2 We consider that the term “modern slavery” encompasses:
- Human trafficking;
 - Forced work, through mental or physical threat;
 - Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
 - Being dehumanised, treated as a commodity or being bought or sold as property;
 - Being physically constrained or to have restriction placed on freedom of movement.
- 1.3 In line with our obligations under the Modern Slavery Act 2015, we have published this statement disclosing the actions we have taken, and are continuing to take to contribute to the vital work of prohibiting modern slavery and human trafficking. We take our responsibilities very seriously, and are committed to full transparency.
- 1.4 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.5 We have structures in place to ensure that we conduct due diligence procedures on all suppliers, contractors and business partners. Our anti-modern slavery policy also forms part of our contract with all suppliers, contractors and business partners, who are required to confirm that no part of their business operations contradicts this policy.
- 1.6 This policy does not form part of any employee’s contract of employment and we may amend it at any time.

2. COMPLIANCE WITH THE POLICY

- 2.1 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

2.2 All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented.

2.3 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains.

3. RESPONSIBILITY FOR THE POLICY

3.1 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.

3.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any necessary training on it and the issue of modern slavery in supply chains.

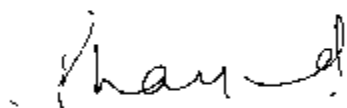
4. REPORTING MODERN SLAVERY OR HUMAN TRAFFICKING

4.1 You should raise any concerns about any issue or suspicion of modern slavery in any part of our business or supply chain at the earliest possible stage. Any concerns should be raised with your line manager or through the Whistleblowing Policy.

5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

5.2 We will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

A handwritten signature in black ink, appearing to read 'Shard'.

January 2024