

Occentis

25 September 2023

Draft for approval by the Board of Directors

MODERN SLAVERY POLICY

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.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. 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 and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may be amended at any time as appropriate.

Responsibility

The Managing Director/CEO has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it, implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring procedures are effective in countering modern slavery.

Compliance with the policy

The company expects that its officers, employees, associates, contractors and stakeholders in general are aware and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or under our control. As such, people are required to avoid any activity that might lead to, or suggest, a breach of this policy.

The Managing Director must be notified as soon as possible if anyone involved with the company believes or suspects that a conflict with this policy has occurred, or may occur in the future.

Everyone is encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business at the earliest possible stage.

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.

Communication and awareness of policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

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

We may terminate our relationship with associates, contractors, or other individuals and organisations working on our behalf if they breach this policy.

Adopted by the Board of Directors..... 2023