

# MODERN SLAVERY POLICY

## POLICY STATEMENT

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 implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

## SUPPLY CHAIN

Onnec Group is committed to ensuring transparency in our business and our approach to tackling modern slavery throughout our supply chains which is consistent with our disclosure obligations under the Modern Slavery Act 2015 (the Act). 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 suppliers to the same high standards.

Our company is made up of several limited company subsidiaries, supported by a central services function. As a provider of information technology and associated services we operate across largely regulated markets in the private and public sectors, primarily our employees work across our operations in the UK & Europe, with service provision across other continents such as Asia, Africa, North America, South America and Australia.

This policy has been published on behalf of the above parent company and its subsidiaries.

The policy applies to all persons working on behalf of Onnec Group or one of its subsidiaries 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.

All goods and services procured go through a central team, which is responsible for assessing the suitability and any associated risk of suppliers and ensuring the relevant due diligence checks are conducted. Preferred suppliers are also highlighted on a purchasing platform and the procurement team within each subsidiary is responsible for maintaining awareness of preferred supplier relationships across the business.

## RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The compliance team have 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 however ultimate responsibility for the implementation and compliance with this policy firmly remains with the CEO and board of directors.

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.

## **OUR POLICIES IN RELATION TO MODERN SLAVERY**

The following company policies support us in ensuring that modern slavery is not taking place in our supply chains or business:

### **Equal Opportunities and Diversity Policy:**

Ensures appropriate procedures are in place to prevent any breaches to international human rights standards, including the United Nations' Universal Declaration of Human Rights (UDHR), the International Labour Organisation (ILO) core conventions on Labour Rights, and the Act.

### **Ethical Purchasing Policy:**

Sets out our strategic approach and the key principles and priorities that apply to all procurement activities, ensuring we have control over our supply chain and potential risks. The policy is complemented by our Ethical Code which sets out our expectations of suppliers in terms of ethical procurement, human rights and governance. It also details the due diligence and assessment is conducted on all suppliers ensuring compliance to relevant legislation.

These policies apply to the Group and are available to all employees via our intranet site and website. The policies are managed by relevant functional heads, our company-wide risk management framework and reporting processes support the escalation of policy issues and the effective management of issues where identified in our business.

## **COMPLIANCE WITH THE POLICY**

Employees must ensure they read, understand and comply with this policy. 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. You must therefore notify your manager, compliance team or the CEO as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are 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, raise it with your manager or the compliance manager.

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.

## **COMMUNICATION AND AWARENESS OF THIS POLICY**

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.

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 other individuals and organisations working on our behalf if they breach this policy.

### **UPDATING THIS POLICY**

Onnec Group will review and update this policy within six months of its financial year end and published on our web site in accordance with the requirements of the Modern Slavery Act 2015.

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