



# Modern Day Slavery Policy

Document Number: OEG-LEG-POL-002

Version Number: 3

Classification: Public

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## 1. Purpose

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 to exploit them for personal or commercial gain.

OEG Group (OEG) 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 in our own business or in our supply chain. In support of this we have a Supplier Code of Ethics which details our expectations for all members of our supply chain.

This policy applies to all persons working for OEG, 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.

The purpose of this Policy is to specify details of OEG's approach to fulfilling its commitment to support the elimination of Modern Slavery and fully meet its obligations under the UK Modern Slavery Act 2015 (hereinafter referred to as the "Act").

## 2. Scope

This procedure applies to all OEG locations, and any individual employed or contracted by OEG.

## 3. Definitions

**Modern Slavery** - Modern slavery is defined as **the recruitment, movement, harbouring or receiving of children**, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

**Human Trafficking** - the unlawful act of transporting or coercing people in order to benefit from their work or service, typically in the form of forced labour or sexual exploitation.

## 4. References

- Modern Slavery Act 2015

## 5. Responsibilities

### 5.1. CEO

OEG's CEO has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under OEG's control comply with it.

### 5.2. Regional Directors

The Regional Directors 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.



### 5.3. Managers

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

OEG will be required to self-attest on an annual basis our adherence to this Policy and an updated statement will be published on our website in accordance with the Act.

### 5.4. All Staff

The prevention, detection and reporting of modern slavery and other forms of corruption are the responsibility of all those working for the Company or under its control. All Staff are required to avoid activity that breaches this policy. At all times you must:

- ensure that you read, understand and comply with this policy; and
- raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

## 6. Policy

OEG is committed to supporting the elimination of acts of Modern Slavery and accordingly we acknowledge The Modern Slavery Act 2015. Within our remit, we encourage others to support the following international standards and as such ask our supply chain to confirm their commitment to the UN Declaration of Human Rights, UN Guiding Principles on Business and Human Rights and Core Conventions of the International Labour Organisation.

This Policy affirms our intention to act ethically in our business relationships to ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chain. OEG communicates this policy across its businesses and highlights how to recognise risks of slavery and human trafficking.

- Ensure that you 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 notify your line manager, regional Director OR senior company Official 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 of any supplier tier 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 line manager, regional Director OR senior company Official OR report it in accordance with our Whistle blowing 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 line manager OR regional Director.
- 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.



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**Implementation Date:** 05/06/2025

**Document Author:** Ryan Weir - Compliance Coordinator

**Document Owner:** Arran Mackenzie - General Counsel

**7. Monitor and review**

The effectiveness and implementation of this policy will be reviewed on a yearly basis.

**8. 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 also terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

For & on behalf of

OEG Group

A handwritten signature in black ink, appearing to read 'John Heiton', written over a horizontal line.

John Heiton

Chief Executive Officer

5<sup>th</sup> June 2025