

Modern Slavery & Human Trafficking Policy

Oakenwoods Group Ltd (OGL) recognises that modern slavery and human trafficking is a violation of fundamental human rights and is contrary to the Modern Slavery Act 2015 (the "Act").

OGL takes a zero tolerance approach to non-compliance with this Policy and will not tolerate any slavery or human trafficking in any part of its business or in any part of its supply chain. This Policy applies to all OGL officers, directors and employees, whether permanent or temporary. It also applies to OGL's supply chain, which must ensure that both its business and that of its supply chain worldwide comply with this Policy.

OGL will take steps to ensure that modern slavery and human trafficking are not taking place in its own business or within any of its supply chain. This will be achieved by ensuring that:

- Suppliers must comply and act in accordance with this Policy. Its Strategic and Preferred supplier base must be accredited to an Achilles third party scheme. Modern Slavery compliance is covered in this. All other Suppliers must have submitted a Pre-qualification document, which also covers the Act.
- All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards.
- The requirements and expectations made of the supply chain in relation to the Act will be clearly communicated and included within contractual terms.
- Suppliers will be expected to comply with the Immigration, Asylum and Nationality Act 2006.
- OGL will take a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates.
- OGL will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it.

Every OGL employee has an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices. Any concerns may be reported to the OGL Risk Management function.

OGL considers a breach of this Policy as a serious offence. Any violation of this Policy or the Act by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, OGL will notify the relevant authorities of an individual or a suppliers contravention of the Act.

This Policy will be reviewed annually to ensure that it reflects current legislation and regulations.



The Board of Directors of Oakenwoods Group Ltd fully endorses this Policy.

I personally commit Oakenwoods Group Ltd to this Policy.

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Nick Kennedy
Managing Director
Oakenwoods Group Ltd

21 January 2025