

MODERN SLAVERY POLICY **(Modern Slavery Act 2015)**

Introduction

This policy outlines the scope of our responsibilities and the processes for identifying, reporting, and addressing any instances or risks of modern slavery and human trafficking within our operations and supply chain.

OMEX has a zero-tolerance approach to 'Modern Slavery and Human Trafficking' connected to any of its business activities.

Scope

This policy applies to:

- All employees, temporary staff, agency workers or contractors.
- Third party labour providers.
- All suppliers, customers, service providers and other stakeholders.
- All operations conducted by and with OMEX within the UK and internationally.

Commitment

OMEX is committed to:

- Ensuring that there is no modern slavery or human trafficking in any part of our business.
- Acting ethically and with integrity in all business relationships.
- Implementing and enforcing effective systems and controls in a risk-based approach.
- Conducting continuous improvement in the due diligence process and making all reasonable efforts to ensure that our key business stakeholders are compliant with the principles stated.
- Raising awareness and providing routine training where appropriate.

Definitions

For the purposes of this policy:

- Modern slavery includes forced labour, servitude, human trafficking, and all forms of exploitation.
- Human trafficking involves the recruitment, movement, or harbouring of people through coercion, deception, debt bondage, or abuse of vulnerability for the purpose of exploitation.

Responsibilities

1. Company Secretary & HR Manager

- Ensure that the policy is reviewed and presented to the Managing Directors on an annual basis for acceptance.
- Publishing in the Staff Handbook.

2. Directors and Management

- Ensure business wide awareness of the policy and its implementation.
- Assess risks within operations and supply chains.
- Oversee investigations and corrective actions.

3. Employees

- Report concerns or suspected breaches.
- Complete all required training.
- Follow company procedures relating to ethical conduct.

4. Connected third parties and business stakeholders

- Must comply with this policy and relevant legislation.
- Must demonstrate transparency in their own supply chains.
- Must notify HR Manager and relevant MD of any suspected or actual breaches.

Risk Assessment and Due Diligence

We undertake proportionate due diligence to identify and mitigate risks, including:

- Supplier onboarding checks.
- Contractual clauses requiring compliance.
- Periodic supplier reviews.
- Assessing high-risk sectors, regions, or labour practices.

Reporting Concerns

Employees, suppliers, and third parties are encouraged to raise concerns about modern slavery. Reports can be made through:

- Line managers.
- HR manager (01526-397-019, 07442-669-181, LucyT@OMEX.com).
- Managing Director.
- Anonymous whistleblowing channels.

All concerns will be taken seriously and investigated promptly. Retaliation against anyone raising a concern in good faith is prohibited.

Training and Awareness

We provide training appropriate to roles and risk exposure, ensuring staff understand:

- How to identify signs of exploitation.
- How to report concerns.
- Their responsibilities under this policy.

Monitoring and Review

This policy will be reviewed annually and updated as necessary to reflect:

- Changes in legislation.
- Evolving best practice.
- Organisational changes.

Breach of this Policy

Any members of staff who do not comply with this policy, along with the data protection regulations and legislation, may warrant disciplinary action which dependent upon the circumstances, could result in their dismissal.



Training material

<https://omex.myabsorb.eu/#/online-course-player/23d314e4-07f2-4652-a79c-21f3c6a03f58>

<https://omex.myabsorb.eu/#/online-course-player/ca16f1db-f4ae-4079-9af8-9078d10e0358>

<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims/modern-slavery-statutory-guidance-for-england-and-wales-under-s49-of-the-modern-slavery-act-2015-and-non-statutory-guidance-for-scotland-and-northe>

Signed *Tommy Brennan*

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Position Company Secretary

Dated 31 December 2025