

Anti-Slavery and Human Trafficking Policy

GLO-POL-002



Modern slavery encompasses slavery, servitude, human trafficking and forced labour according to the Modern Slavery Act 2015.

Ovarro has a zero-tolerance approach to any form of modern slavery and is committed to acting ethically, with integrity and transparency, by putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain. This policy covers all the activities of Ovarro and its subsidiaries, it governs all our business dealings and the conduct of all persons or organisations with whom we contract directly, or whom we appoint to act on our behalf. We expect that our suppliers will hold their own suppliers to the same high standards.

1.1 Commitments

We shall be a company that expects everyone working with us, or on our behalf, to support and uphold the following measures to safeguard against modern slavery;

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us, or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy. Our policy on whistleblowing encourages all Employees, Customers and other Business Partners to report any concerns related to the direct activities of the organisation or its supply chain without fear of retaliation.
- We are committed to ensuring that employees are made aware of the policy via annual updates and at employee induction. Ovarro will provide adequate and regular training on the issue of modern slavery, when available, so that all employees understand and comply with this policy.
- We endeavour to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour and undertake appropriate background checks. Aligning with our risk-based approach we may seek affirmation of a potential Employee's right to work is carried out, before any offer of employment is made.
- We take a risk-based approach to our contracting processes, our stakeholders and our suppliers, and assess whether circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Consistent with our risk-based approach we may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with this policy.
 - Suppliers to ensure that all terms of employment are voluntary, and if required, we may request demonstration of compliance with this policy.
 - Audits of suppliers, for their compliance with our Anti-Slavery Policy, where any risk of non-compliance is suspected.

- If we find that individuals or organisations working for Ovarro, or on our behalf, have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated, or where applicable termination of relationships with individuals or organisations.

This policy is reviewed twice annually in Quality Review Meetings attended by Senior Management of Ovarro to ensure effective systems and controls are in place to safeguard against any form of modern slavery taking place within our Business or Supply Chain.

Approval	Date
	06/08/2020
David Frost, Chief Executive Officer	