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OCF ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

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1. Version Control

Version	Date	Revision Author	Summary of Changes	Approver	Approval Date
2.0	24/11/2023	Sharon Johnson	Updated branding Review of procedures	Russell Slack	24/11/2023
3.0	01/08/2025	Faye Exton	Policy review	Faye Exton	01/08/2025

Stakeholder	Distribution Method
All Employees	Document Control Staff Handbook Induction

2. Anti-Slavery and Human Trafficking Policy

Policy statement

In meeting with our obligations under the Modern Slavery Act 2015 OCF offers the following statement as our contribution in the prevention of modern slavery.

Modern slavery can take various forms, such as, servitude, forced or compulsory labour and human trafficking. OCF has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity and transparency in all of our business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our business or supply chains, consistent with our obligations under the Modern Slavery Act 2015. OCF also expects the same high standards from all of its suppliers, contractors and other business partners and, as part

of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for OCF or on OCF's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

2.1. Responsibility for the policy

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

OCF's HR representative has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in OCF's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

2.2. Compliance

The prevention, detection and reporting of modern slavery in any part of OCF's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for OCF or under OCF's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with OCF's Whistleblowing Policy, contained in the Staff Handbook. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of OCF's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of OCF's

supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

OCF aims 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. OCF is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

2.3. Training and communication

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

OCF's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

2.4. Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

OCF may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.