



## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

### **Policy Statement**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

OOS Energy and affiliated companies have zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 (the 'Act'). We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we should include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standard.

This policy applies to all persons working for OOS Energy or on our behalf in any capacity, including staff members, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

All Staff Members of OOS Energy are required to comply with this policy. It does not form part of any employee's contract of employment and OOS Energy may therefore amend it at any time without notice.

### **Responsibility for the Policy**

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

The HSEQ department has 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

All employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HSEQ department.



## **Compliance with the Policy**

All employees must ensure that they 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. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. All employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains of any supplier at the earliest possible stage. If an employee believes or suspects that a breach of this policy has occurred or may occur in the future he or she must as soon as possible notify his or her manager or the HSEQ department. If an employee is unsure about whether a particular act, the treatment of workers more generally or their working conditions within any of our supply chains constitutes any form of modern slavery, he or she is expected to raise it as soon as possible with his or her manager or the HSEQ department.

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 in whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If an employee believes that he or she has suffered any such treatment, he or she should inform the HSEQ department immediately. If the matter is not remedied, and he or she is an employee, he or she should raise it formally using our Grievance Procedure.

## **Communication and Awareness of this Policy**

Our zero-tolerance approach to modern slavery should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforce as appropriate thereafter.

## **Breaches of this Policy**

Any staff member who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

This policy will be communicated to ALL staff, contractors and suppliers, and be available for the public.

Endorsed by:

*Cor Selen, CEO OOS Energy BV.*