



SHB-AST-044 – Anti-Slavery and Human Trafficking Policy

1.1. Background

This Policy reflects our unwavering commitment to eradicating modern slavery and human trafficking in all aspects of our operations. This policy establishes a comprehensive framework to identify, prevent, and mitigate risks related to slavery and human trafficking within our business and supply chains.

1.2. Scope

This policy applies to all employees, Directors, associates, and anyone acting on behalf of Oaklin.

1.3. Policy Statement

1.3.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour 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. Oaklin has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships, and are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.3.2. We are also committed to ensuring there is transparency in our own approach to tackling modern slavery in our business and throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, 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 standards.

1.4. Compliance with the Policy

1.4.1. 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

1.4.2. You must notify a Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

1.4.3. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or our supply chains at the earliest possible stage.

1.4.4. 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.

1.4.5. Your concerns will be kept confidential with only those being reasonably required to know about your concerns to be made aware of them.

1.5. Communication and awareness of the Policy



- 1.5.1. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular refresher training will be provided as necessary.
- 1.5.2. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 1.5.3. Where we are selecting suppliers in a competitive process, a supplier's approach to managing modern slavery risks must be included in the assessment criteria.