

## **Anti-Slavery / Modern Slavery Statement 2024**

Origin Global is proud of its ethical standards and values, which underpin the aims of the Modern Slavery Act 2015. Origin has zero tolerance for any activity that constitutes modern slavery or human trafficking under the Modern Slavery Act 2015. We have reviewed our existing compliance and risk management processes to determine what measures already exist and what further measures may be required to prevent slavery and human trafficking in any part of our business or supply chains.

This statement covers all our business dealings and the conduct of all persons or businesses with whom we contract directly or whom we appoint to act on our behalf. We expect all companies with or seeking a business relationship with Origin Global to familiarize themselves with our anti-slavery values and act consistently with our anti-slavery policy.

### **Our Anti-Slavery Values**

- We operate core business values that reflect our relationships with clients, customers, suppliers (including sub-contractors and agency workers), and employees.
- We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can.
- We demand the same attitude from all who work for us and expect it of all with whom we have business dealings.
- We have a Zero Tolerance attitude towards modern slavery.
- We will operate ethically and with integrity in our business dealings.
- We will implement systems and controls to ensure enslavement is not taking place in our businesses or our supply chain.

### **Policy on Slavery and Human Trafficking**

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour, and human trafficking, all of which involve the deprivation of a person’s liberty by another to exploit them for personal or commercial gain. This policy aims to prevent opportunities for modern slavery to occur within our businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

As a company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our businesses or those of our suppliers.

We are committed to ensuring transparency in our own business and our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory, or trafficked labour or anyone held in slavery or servitude, whether adults or children. We expect and require our suppliers to hold their own suppliers to the same high standards.

Our employees have an obligation to familiarise themselves with our procedures to help identify and prevent modern slavery and to conduct business so that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees' obligations under their contract of employment.

## **Due Diligence**

While recognizing our statutory obligation to set out the steps we have taken to ensure modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and businesses in the entire supply chain. To underpin our compliance with practical steps, we intend to implement the following measures:

- Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- Engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
- Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example, as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- We will include in the directors' report accompanying our annual financial statements a reference to the Company's Slavery and Human Trafficking Statement, which will also be presented on our website.

## **Responsibility**

Ultimate responsibility for preventing modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations. Line Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and receive adequate and regular training on it and the issue of modern slavery.

## **Actions to Report Modern Slavery or Human Trafficking**

The Company's Whistleblowing Procedure provides guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with any of our businesses or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees only and may be found in the Staff Handbook.

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 business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

The Company will accept and take seriously concerns communicated anonymously. However, anonymity makes conducting robust investigations and validating claims more difficult and can make the process less effective. Complainants are therefore encouraged to put their names to allegations. Any claims or allegations found to be malicious or vexatious will result in disciplinary action against the individual.

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

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, agencies, subcontractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. We will provide the necessary training to our employees that is proportionate and relevant to uphold our Company values on Slavery and Human Trafficking.

## **Review and Monitoring**

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Board of Directors regularly (at least annually) and may be amended from time to time. We are committed to continuous improvement and will update our practices as necessary to remain compliant with evolving legal requirements and best practices.