

# Modern Day Anti-Slavery Policy Version 1.2

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## Modern Day Anti-Slavery Policy.

#### 1. Purpose.

OpusApeiro Limited is committed to operating with integrity and fairness. We recognise the grave issue of modern slavery and human trafficking, and we are dedicated to ensuring that these practices have no place in our business or supply chains.

#### 2. Scope.

This policy applies to all employees, contractors, suppliers, and partners associated with OpusApeiro Limited.

#### 3. Policy Statement.

OpusApeiro Limited strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to taking all necessary steps to ensure that our business and supply chains are free from these practices.

#### 4. Definitions.

- Modern Slavery: Encompasses slavery, servitude, forced and compulsory labour, and human trafficking.
- Human Trafficking: Involves the recruitment, transportation, transfer, harbouring, or receipt of persons, by means of threat or use of force, coercion, abduction, fraud, or deception for the purpose of exploitation.

#### 5. Responsibilities.

- Management: Ensure compliance with this policy and integrate it into all business operations.
- Employees: Understand and comply with this policy. Report any suspected cases of modern slavery or human trafficking.
- Suppliers and Partners: Adhere to this policy and ensure their operations and supply chains are free from modern slavery and human trafficking.

#### 6. Due Diligence.

OpusApeiro Limited will conduct due diligence in our operations and supply chains to prevent modern slavery and human trafficking. This includes:

- Risk Assessment: Identify areas where there is a risk of modern slavery and human trafficking.
- Supplier Audits: Regularly audit suppliers to ensure compliance with our anti-slavery policy.
- Contractual Obligations: Include anti-slavery clauses in contracts with suppliers and partners.



# 7. Training and Awareness.

We will provide training to our employees to ensure they understand and can identify signs of modern slavery and human trafficking. This training will be part of our onboarding process and ongoing professional development.

# 8. Reporting and Whistleblowing.

We encourage employees, suppliers, and partners to report any concerns or suspicions regarding modern slavery and human trafficking. Reports can be made through:

- Confidential Reporting Mechanism: A dedicated hotline or email address for anonymous reporting.
- Whistleblowing Policy: Protection for whistleblowers who report concerns in good faith.

## 9. Monitoring and Review.

OpusApeiro Limited will regularly review this policy and our practices to ensure their effectiveness in combating modern slavery and human trafficking. We will report on our efforts and progress in our annual sustainability report.

## 10. Commitment.

OpusApeiro Limited is fully committed to eradicating modern slavery and human trafficking in all its forms and ensuring ethical practices throughout our business and supply chains.

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