



# Omexus Group

## Modern Slavery Statement

### Version 5.2

### 14 December 2023

Last Reviewed	Next Review Due
14/12/2023	14/06/2024

**Classification: Commercial in Confidence**

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Slavery is illegal everywhere in the world, but despite that, there are currently an estimated 40.3 million people in modern slavery or victims of human trafficking across the globe. Out of the millions of people trapped in modern slavery, 16 million people are exploited by the private sector, so it is paramount that businesses take action to end these abhorrent practices.

We are committed to playing our role by ensuring that through our management and operations we have the systems, policies, and processes in place to identify any potential instances of exploitation and, if found, eradicate modern slavery in all its forms from our business and supply chain. We are taking the appropriate steps to ensure that everyone who works for us benefits from a working environment in which their fundamental human rights are respected and anyone that we do business with also upholds these principles.

The information in this statement details policies, processes, and actions we have taken to mitigate the risk of modern slavery and human trafficking in our supply chains and any part of our own business. It covers the activities and is our Modern Slavery Statement required under the provisions of the Modern Slavery Act 2015 (the Act).

## **2 OUR BUSINESS**

We are committed to being a purpose-led organisation that exists to create better outcomes for all stakeholders. This includes our people, clients, customers, suppliers, and partners, as well as investors and civil society organisations:

- Our people – by providing an environment in which they can thrive and develop.
- Our clients – by delivering high quality service, solutions, and transforming their businesses and services.
- Our customers – by being focused on delighting them.
- Our suppliers and partners – by treating them fairly and encouraging them to deliver and build lasting commercial relationships.
- Our investors – by delivering attractive returns and regular communication.
- Society – by acting as a responsible business for the communities we serve.

We are driven by our purpose to create better outcomes for our colleagues, clients, customers, suppliers, partners, investors, and society. We are committed to being a responsible business in how we operate, serve society, respect our people and the environment, and deliver improving returns to our investors. Everyone strives to create better outcomes for all our stakeholders by living our values of being collaborative, respectful, passionate, accountable, and working with integrity. We bring these values to life through our day-to-day behaviours and by aspiring to put our purpose at the centre of everything we do.

### **3 OUR POLICIES IN RELATION TO MODERN SLAVERY**

Our commitment to human rights and the eradication of modern slavery is overseen by our Senior Leadership Team. The following company policies support us in mitigating the risks of modern slavery in our business and supply chain. They apply to all and are available to all colleagues via our intranet site. The policies are managed by relevant functional heads and are imbedded in our company-wide risk management framework.

#### **Code of Conduct:**

The Code of Conduct describes what we must do and how we must behave to ensure we have the trust of all our stakeholders. It details how we will create better outcomes in the right way, not at any cost, in line with our purpose and values. The Code builds on these foundations and applies to everyone who works at, or with, us. It summarises in one place elements of our key policies, and the standards and procedures which support them.

#### **Speak Up Policy:**

Sets out our commitments to speaking up about serious concerns, detailing how any person working at or with us, including those employed in our supply chain, can raise concerns or “whistle blow” and the channels available to do so confidentially, responsibly, and effectively and without fear of repercussions.

#### **Supplier Charter:**

Sets out the principles of how we will conduct business in an open, honest, and transparent manner, and the behaviours and practices we expect of our suppliers and partners. This includes specific reference to our expectations for our suppliers to never use or support practices that inhibit the development of children, not hold an individual or group in slavery or servitude, not use any form of involuntary labour, nor traffic individuals or groups for the purpose of labour exploitation in line with the Modern Slavery Act. We expect all our suppliers to report any issues of compliance with our charter to use within five working days, or any shorter period required by regulation. We expect all our suppliers’ colleagues or contractors to report any breaches through their own grievance mechanism, or directly to us.

#### **Diversity and Inclusion Policy:**

Ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated. Our policy is supported by a mandatory Diversity and Inclusion training module for all colleagues that needs to be taken annually.

#### **Procurement Policy:**

Sets out what our suppliers should expect from us when we buy goods and services and the requirements that must be met when doing so. This includes operating responsible business procurement practices with clear and fair procurement processes and paying promptly in accordance with payment terms.

## **Human Rights Policy:**

Ensures appropriate procedures are in place to mitigate the risk of potential breaches of international human rights standards, including the United Nations Universal Declaration of Human Rights (UDHR), the International Labour Organisation (ILO) core conventions on Labour Rights, and the Modern Slavery Act. The Human Rights policy is referenced within our mandatory Diversity and Inclusion training module.

## **Wellbeing Policy:**

Sets out our commitment to prioritise and create working environments that protect, support, and promote the wellbeing of all our colleagues, managing any factors that may cause negative emotional, psychological, physical, or social impacts. We expect everyone to have the necessary training and awareness to protect the wellbeing of all our colleagues with working conditions that make our people feel happy and healthy.

## **Safeguarding Policy:**

Sets out our commitment to safeguarding our colleagues, and any other adults at risk or children who encounter us during work related activities. Safeguarding relates to promoting the welfare of adults or children at risk and protecting them from harm. We are committed to providing the necessary training to our colleagues to do this, fulfilling our legal and regulatory safeguarding requirements, and providing a safe, efficient, confidential, and supportive process for reporting and managing any safeguarding concerns or issues.

## **4 TACKLING MODERN SLAVERY – OUR PEOPLE**

We continue to develop our culture, so wellbeing becomes an intrinsic part of everything all colleagues do, encouraging managers to have wellbeing conversations with their people as part of their regular check-ins. We focus on helping to ensure the right home, office or hybrid working environments to support the safety and mental health of our people, which includes processes for colleagues to raise reasonable adjustment requests. Our Safeguarding Policy sets out our approach to protecting our teams, service users and any member of the public who we have contact with. By embedding this policy, we promote a culture where safeguarding is everybody's business and ensure a clear and structured approach to safeguarding in all areas of our business.

### **Being a Responsible Employer**

To ensure that we recruit and treat employees fairly, mitigating the risks of modern slavery, our human resources (HR) policies set out our procedures on how we:

- Recruit and select employees in a fair, lawful, and professional manner, both for internal and external candidates
- Treat all employees fairly during their employment and, if there is an occasion when an employee does not feel that they have been treated fairly, there are

procedures in place to raise a grievance or involve a local trade union, where they exist, or where this is a legal requirement to do so

- Manage the exit of an employee from the business in a fair and consistent manner

Our Human Rights Policy details our commitments to labour and workplace rights. We provide fair working conditions for all our employees including terms and conditions of employment, remuneration, working hours, health and safety, resting time, holiday entitlements and benefits. These are applied according to territory-specific statutory requirements.

Our employees pay will not be lower than that required by local law, or, in the absence of a law, the level paid generally within our industry. Hours of work will be in line with local law or, in the absence of law, the norm within our industry, and shall not be excessive. Employees shall not be contractually required to work more than 48 hours per week and overtime will only be worked on an optional basis. Forced or compulsory labour is prohibited. Employees will not be forced into involuntary labour and coercion at work is not acceptable. Financial penalty as a disciplinary sanction is prohibited.

## **5 TACKLING MODERN SLAVERY – OUR SUPPLY CHAIN**

### **Working in Partnership with Recruitment Agencies**

We work with agencies who must comply with our Supplier Charter and undergo our rigorous due diligence assessment to ensure that they are recruiting in line with our policies and values, and that they apply inclusive and value-based recruitment practices.

### **Working in Partnership with Trade Unions**

We take a partnership approach to union relations as we believe it adds value to all the stakeholders and relationships concerned. We also believe it provides our colleagues and recognised unions with genuine opportunities to contribute to the future success of our organisation.

### **Mapping our Supply Chain Risk**

We have a Supplier Risk Framework for assessing and managing our supply chain risk and introduce controls to ensure compliance to our Policies and Supplier Charter. The Risk Framework covers the full supplier lifecycle and defines the organisational responsibilities for supplier management.

We consider the labour and human rights theme as a priority risk area in relation to modern slavery and as such, suppliers are assessed against all aspects of their treatment of their people, including a requirement to provide evidence of how they guard against modern slavery.

## **Due Diligence**

As a minimum, we expect both ourselves and our suppliers to comply with all applicable local laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically, and using environmentally responsible practices where practicable.

Suppliers' compliance to the Supplier Charter is managed through our rigorous supplier onboarding due diligence process for all new suppliers and is monitored via our Supplier Relationship Management process through which we will maintain and monitor a supplier risk scorecard which will assess a supplier's exposure to all risks including modern slavery.

We prioritise suppliers that can demonstrate commitment to upholding responsible business practices. Our standard terms and conditions include a clause that all suppliers are required to comply with our Supplier Charter and uphold the highest standards of human and labour rights. We have a zero tolerance for modern slavery and reserve the right to terminate a relationship with a supplier or third party that cannot demonstrate compliance with our Human Rights and Modern Slavery Policies.

## **6 TRAINING AND COMMUNICATION**

To make colleagues aware of the Act, we share this statement with all colleagues through our internal communication channels. We continue to provide awareness training to all colleagues of our commitments to identify the risks of, and remove all instances of, modern slavery, human trafficking, and exploitation through our mandatory annual training.

We also communicate with all our colleagues on a regular basis on a number of issues which includes Group wide communication and campaigns, as well as divisional and local communication.

## **7 BOARD APPROVALS**

This statement is made pursuant to Section 54(1) of the Act, has been approved by the Senior Leadership Team and will be updated in line with the Modern Slavery Act's reporting requirements.

# DOCUMENT CONTROL

## DOCUMENT HISTORY

Revision Date	Version Number	Summary of Changes	Author
22/02/2017	1.0	First Version	Natalie Knott
22/11/2017	2.0	Second Version	Natalie Knott
22/02/2019	3.0	Align to Parent Co Guidelines	Natalie Knott
11/06/2019	4.0	Align to Parent Co Guidelines	Natalie Knott
11/12/2020	5.0	Align to Parent Co Guidelines	Natalie Knott
12/06/2023	5.1	Enforcement Format	Natalie Knott
12/12/2023	5.2	Updated & Rebranded	Zeeshan Faraz

## REVIEWERS

Name		
Martyn Clark	Risk & Privacy Manager	14/12/2023

## APPROVERS

Name		
Emma Cowan	CEO	14/12/2023

## DISTRIBUTION

Name	
All Staff	SharePoint

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