

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY 2020

Opportunity Access is committed to preventing modern slavery and human trafficking from affecting any part of our business and our suppliers.

As a company, Opportunity Access maintains relationships with many different organisations in its supply chain, as well as supplying varying levels numbers of contract, interim, temporary and permanent workers.

In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine what existing measures are undertaken and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or supply chain.

Opportunity Access has adopted a statement of our corporate values on the prevention of modern slavery and human trafficking. This value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all or who have, or seek to have, a business relationship with Opportunity Access, to familiarise themselves with, and act at all times in a way which is consistent with, our anti-slavery value.

STEPS FOR THE PREVENTION OF MODERN SLAVERY

We are 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.

We expect the same high standards from all of 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 our suppliers to hold their own suppliers to the same high standards. All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented.

Adherence to this policy forms part of all team members' obligations under their contract of employment. Whilst recognising our statutory obligation to set out the steps we have taken to ensure that 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 organisations in our supply chains.

To underpin our compliance with practical steps, we intend to implement the following measure:

1. (i) 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;
2. (ii) (ii) 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;

(iii) (iii) 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;

(iv) (iv) 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.

November 2020

Signed:
Christine Robinson (CEO)

