

## Modern Slavery Policy

### 1. General Statement

It is well recognised that slavery still exists and that some of the most vulnerable people in society continue to be ruthlessly exploited for criminal gain. The Government introduced legislation with a view to stamping out modern slavery. The Modern Slavery Act 2015 received royal assent in March 2015; its principle purpose is to consolidate existing legislation regarding criminal offences relating to slavery, including human trafficking, forced labour and other forms of exploitation. The Act is designed to provide law enforcement agencies with stronger methods to tackle modern slavery and enhance protection for its victims.

Omega recognises that being responsible and sustainable really matters to us. We are dedicated to making sure everything we do is ethical and lawful, and that we work in a socially and environmentally sustainable way.

It is important that our suppliers feel the same way, and that is why we have put together this code of conduct to give you a good idea of what it means to work with Omega.

Our code is a set of principles that we expect all suppliers to work within. We will be working with our suppliers to make sure they have the right policies and processes in place to comply with these principles, and that they also use them with their own suppliers. We will also consider these principles when we are choosing suppliers, and we will be working together to monitor compliance throughout our relationship.

A lot of the principles in this code are about complying with laws and regulations. By this, we mean laws and regulations that apply in the jurisdiction that suppliers operate in. At Omega this compliance is the minimum standard we are looking for, and we are always working with our suppliers to improve things further.

Wherever we are working regularly with suppliers, we will do everything we can to make sure processes are in place to check that our principles are being followed and continually reviewed and that there are solutions available for anything that needs to be put right. We will do this through our contracts with suppliers, and we might use independent third parties to check that our suppliers are complying with our principles.

### 2. Our Principals

The principles in this code are not meant to provide an exhaustive list of expectations of suppliers, just things that matter most. These are our priorities;

#### Freedom of Employment

Employees should be free to choose to work for their employer and to leave the company after they have given reasonable notice.



## Employment Relationships

Employees should have an easy to read contract of employment, which needs to comply with legislation and be particularly clear about wages. Employees who are unable to read the contract should be introduced to a suitable person, who can read and explain the contract to them.

## Freedom of Association

Employees should be free to join trade unions (or other kinds of representation) and, where appropriate, to carry out representative functions at work, in accordance with relevant legislation. Employees should not be discriminated against, or, be treated unfavourably or differently because they carry out representative functions.

## Wages

Wages and benefits need to be in accordance with the relevant legislation. Employees should give their informed, freely given consent to any deductions (which should also be lawful).

## Child Labour

Omega does not support the use of child labour in any circumstances.

Where children under the age of 18 are legally employed, they must not be employed at night or in hazardous conditions. All suppliers must work towards elimination of child labour and this should be in a manner consistent with the best interests of the children concerned.

## Working Hours

Suppliers should comply with legislation and/ or industry standards on working hours, giving employees days off and resting times accordingly. Suppliers must not make workers do more than 48 hours overtime per week and workers shall be provided with at least one day off in every seven.

Overtime should be voluntary and not demanded on a regular basis. Employees working overtime should be reimbursed at an appropriate rate.

## Treating Employees with Respect and Dignity

Employees should never be abused, harassed or intimidated, and any disciplinary measures taken should be recorded. Employees should have access to a written grievance or appeal procedure that is clear and easy to understand. Employees who are unable to read the procedure should be introduced to a suitable person, who can read and explain it to them.

## Health and Safety



Suppliers will provide their employees with a safe and healthy workplace and should make sure a senior management representative is responsible for Health and Safety, and that appropriate policies and procedures are in place.

### Discrimination

Suppliers will not discriminate in hiring and employing workers on the basis of race, caste, birth, social or ethnic origin, religion, nationality, age, gender, gender identity or expression, marital status, sexual orientation, disability, maternity, union membership or political affiliation.

### The Environment

Suppliers should try and minimise any potential impact on the environment when supplying goods and services to us. As a minimum we expect suppliers to comply with all local and national environmental legislation, regulations and directives to protect and improve the environment, and have developed; reviewed and recorded processes in place to make sure they comply.

We also expect suppliers to have action plans in place to manage their environmental impact, e.g. energy reduction and waste management programs. Where appropriate, suppliers must also comply with additional environmental requirements specific to the products and services supplied to Omega. Any specific requirements would be outlined in the contract.

### Business Ethics

Suppliers should uphold the highest standards of integrity, transparency and governance, and, as a minimum, we expect our suppliers to comply with all relevant legislation and regulations. Suppliers must not take part in forms of bribery or corruption, and must not knowingly be associated with any group that supports acts of violence, terrorism or discrimination.

### Our Supplier Engagement Process

We expect openness and transparency in our relationships with our suppliers. We want to work together to improve our sustainability performance, and we will endeavour to support continuous improvement with any supplier that needs help meeting the principles of this code. Transparency includes maintaining documentation necessary to demonstrate compliance with those principles including ensuring compliancy with all 'right to work' documentation. Omega may exercise its relevant contractual rights to access documentation and raise reasonable enquiries.

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1<sup>st</sup> November 2024