

Modern Slavery Policy

1. Overview and how we define Modern Slavery

- 1.1 Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery' – criminal activity that deprives victims of their liberty and usually involves financial and other exploitation.
- 1.2 We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains. We will not tolerate it.
- 1.3 You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider.
- 1.4 Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you.
- 1.5 Our Anti-Slavery Officer ('ASO') is Natalie Starkey, HR Director, who is responsible for this policy.
- 1.6 If you are an employee, this policy does not form part of your employment contract, and we may update it at any time.

2. Preventing Modern Slavery in our business

- 2.1 We carry out appropriate checks on all employees, recruitment agencies and suppliers, so that we know who is working for us or on our behalf.
- 2.2 We give every employee a written employment contract, and he or she is paid in accordance with the law. We comply with our legal obligations to ensure the health and safety of all our employees and workers, including in relation to working hours, rest breaks and holidays.
- 2.3 All employees are required to sign a copy of this policy to show they have read and understood it.

If you are one of our Suppliers

- 3.1 If you supply us with goods or services, you must assess your business and supply chains and confirm to our ASO that you:
 - Comply with your legal obligations, in relation to Modern Slavery; and
 - Are committed to ensuring there is no Modern Slavery taking place in your business, or in any of your supply chains.
- 3.2 You will be requested to provide a copy of your antislavery policy/statement.
- 3.3 If you breach this policy or are found to have Modern Slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.

4. If you are an Employee or a Worker providing services for us

- 4.1 You must immediately report any suspicions of Modern Slavery in our business or supply chains to our ASO. Our ASO will investigate and report to our [Board of Directors] within a reasonable time, on actions which may require to be taken.
- 4.2 You will not suffer any detrimental treatment because of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately tell our ASO and, if you are an employee, refer to our Grievance and Whistleblowing Policies.

Signs of Modern Slavery in our Supply Chain

Modern slavery cases are on the rise in the UK construction sector, requiring coordinated action at all levels to eliminate this serious issue. Modern slavery is a severe crime that often goes undetected, involving the exploitation of individuals who are forced to work against their will.

Indicators of Modern Slavery may include (but are not limited to):

Appearance:

- Signs of physical or psychological abuse.
- Look malnourished or unkempt.
- Appear withdrawn.

Isolation:

- Restricted freedom of movement.
- Rarely allowed to travel alone.
- Seem under control/influence of others.
- Rarely interact.

Living conditions:

- Living in dirty, cramped or overcrowded accommodation.
- Living and working at the same address.

Possessions:

- Have no travel documents/passports.
- Few or no personal possessions.
- Always wear the same clothes.
- Clothes not suitable for their work.

Time:

- Unusual travel times.
- Dropped off/collected for work in a regular basis, either very early or late at night.
- Work excessive hours.

Manner:

- Reluctance to seek help.
- Avoid eye contact.
- Appear frightened or hesitant to talk.

What should you do if you suspect Modern Slavery is taking place?

The Board of Directors at ODGroup (including OD Projects (Holdings) Ltd, OD Interiors Ltd & OD Create Ltd) is fully committed to upholding this policy. If you raise a genuine concern, you will be protected - it

does not matter if you are mistaken. You will not be at risk of losing your job or facing any form of retaliation because of reporting your concerns.

If you suspect that modern slavery is taking place, you should immediately report it to the Project Manager/Senior Project Manager and the Project Director on site, who will escalate the matter to the Board of Directors and ASO.

Other reporting methods include:

- Report it [online](#) or call 101.
- You can also report it in person at a police station. Find your nearest police station [here](#).
- In an emergency always call 999.

Your vigilance and commitment to ethical practices are essential in helping us combat modern slavery.

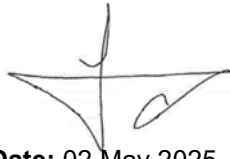
Training/awareness

Modern slavery awareness and updates are integrated into our office and on-site health & safety induction training. Additionally, relevant employees - including those in supply chain, procurement, human resources, health & safety, and senior on-site roles - are required to complete a modern slavery and human trafficking e-learning module.

This training, recently updated to reflect the latest guidance, ensures compliance with the Modern Slavery Act 2015 and reinforces our commitment to ethical practices.

Furthermore, all employees will be required to acknowledge that they have read and understood the Modern Slavery Policy, with this process overseen by the HR Team.

For and on behalf of ODGroup



Date: 02 May 2025

Signed: Jon Kearney, Group Managing Director