

## Modern Slavery and Human Trafficking

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This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022.

This statement sets down the commitment of OLG and its subsidiaries to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.

We all have a duty to be alerted to risks, however small. Staff are expected to report their concerns and management to act upon them.

### Our commitment

We currently operate throughout the UK employing around 400 people with revenues of £28m. Our business is separated into three reporting business groups, our OLG Consulting business provides process design and consultancy services. Our Engineering business provides multi-discipline engineering, project management, fabrication, and construction services. Our Recruitment business provides tailored temporary, temp-to-perm and strategic permanent recruitment and agency provision to clients.

Our clearly defined purpose and strategy, reinforced by our culture is fundamental to sustaining value over the longer-term, we work closely with our suppliers to deliver to our stakeholders.

Our suppliers are pivotal to our ability to deliver services to our clients on time, within budget and to the quality that we and our clients expect. Making sure that modern slavery and human trafficking is not part of our supply chain helps us to maintain healthy and sustainable relationships.

### Our values and code of conduct

OLG's values of **Accountability**, **Bold** and **Culture** underpin our commitment to care, support and integrity towards our workforce, clients and partners in a shared vision.

Our success is influenced by the assistance of our workforce and their feeling of being part of a family. This is accomplished by our values which sets the tone, help create our culture and provide a common set of principles for our people to follow. These values extend through our business into our supply chain.

### Accountability

If it is to be, it's up to me. Be accountable for our actions and inactions.

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### Bold

We continuously strive to use the latest research and technology to develop more efficient solutions to help our clients provide a sustainable future.

### Culture

We appreciate diversity and encourage different opinions.

At OLG, doing the right thing guides how we work and live. Our Code of Conduct, helps us meet our ethical and legal commitments ensuring we stay on track when there are questions or situations where the right course of action may be unclear. We strive to protect and enhance the human dignity of our personnel and everyone who has dealings with our Businesses. By following the Code, we maintain, strengthen and protect our reputation for adhering to both our values and legislative requirements.

In addition, our Supplier Code of Conduct aligns with our values and principles and sets the expectations of those we work with to meet OLG's ethical standards. We require our supply chain partners to adhere to these principles and expect them to enforce these principles upon their own supply chain.

### Governance

The leadership for human rights issues including modern slavery and human trafficking comes from our Board of Directors. Accountability for managing human rights risks is shared across OLG functional and operational teams.

Our Human Rights policy, documents and affirms our commitment to upholding basic human rights. This policy is supported by related policies that address how we conduct business to maintain high standards of ethics and integrity, promoting dignity and respect for how we treat our people and with those we interact. OLG's Code of Conduct and Supplier Code of Conduct guides our approach to business and are reflected in all OLG policies and procedures as we continue to revise and strengthen our approach to protecting people.

### Assessing the risk of Modern Slavery

We recognise the services OLG provide in Project, Engineering and Recruitment services creates challenges and risks for the manifestation of human rights and modern slavery issues, that require dedication to identify and mitigate in our operations or of those we work with. Modern Slavery is captured in our group risk process and monitored through Board reporting.

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### Direct employment and temporary staff

Where we directly employ people, including temporary staff (excluding contractor personnel), OLG exercises the greatest control over employment and working conditions and the risk of modern slavery and/or human trafficking is regarded as low. This is due to the corporate governance processes, policies, and procedures we have in place to guide and protect our people. All our governance materials are aligned with both our Code of Conduct and Human Rights Policy, implemented to ensure that our employees have access to rights and conditions in line with all aspects of the Universal Declaration of Human Rights as adopted by the United Nations General Assembly within our sphere of influence, including but not restricted to:

- Equality and anti-discrimination policies
- Right to paid holidays
- Fair pay
- Safety and security
- Fair and just culture

### Indirect employment and supply chain

OLG's diverse service offering across multiple industries requires a flexible and responsive workforce, resulting in many different forms of contractual relationships. We recognise that third party labour, unlike our directly employed personnel, can give rise to differing standards in working conditions and compensation where we have, in some cases more limited control over our supply chain.

We continue to engage with our supply chain in the following ways:

<b>Direct Influence</b>	Where we contract directly with and can mandate and require our suppliers and subcontractors and their sub-tiers to meet our Suppliers Code of Conduct
<b>Shared Influence</b>	Where we manage contractors and other third parties who are contracted by our customers, on their behalf, necessitating a collaborative approach
<b>Procurement Services</b>	Where we procure on behalf of our customers, necessitating the need to work closely with our customers to build upon their controls and processes.

We recognise the continually evolving nature and scale of our business brings significant challenges to our supply chain management systems and we are cognisant of the need to continually strengthen our

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approach to identify and mitigate the risks we face from modern slavery and human trafficking. In 2021 we renewed our commitment to ensuring our suppliers adopt the highest ethical standards of operation through their adoption of our Supplier Code of Conduct as well continuous development of our supplier due diligence processes that ensure we retain and enhance human rights components.

### High Risk Activities

OLG has identified that the greatest risk for modern slavery and human trafficking exists in our third-party relationships, where contractors utilise recruitment agencies for the employment of low skilled personnel.

We are committed to ensuring that suppliers falling into this area of heightened risk are identified, assessed and monitored as part of our routine supply chain governance and approach to managing the risk from modern slavery and human trafficking.

### Due Diligence

Compliance with our Code of Conduct is mandatory for our directors, officers and employees as well as all contractors and consultants.

We encourage personnel to self-report in confidence any breaches of our code of conduct which includes human rights and modern slavery concerns.

In our supply chain, where OLG has direct control, we have established due diligence procedures designed to assist us in identifying supply chain partner risks and sets out our expectations as a partner. Where we work with our client's supply chain we collaborate to identify and mitigate potential modern slavery and human trafficking, sharing our processes to assist in addressing issues.

### Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, OLG publishes a range of materials on our Staff Portal aimed at ensuring all personnel are aware of how to spot the signs of modern slavery and human trafficking and how to report any concerns.

This statement was approved by the board of directors on 20<sup>th</sup> September 2021.

Name: Stephen Laird  
Position: Company Secretary  
Date: 20<sup>th</sup> September 2021

## Modern Slavery and Human Trafficking

### Revision Control

Policy Author:	S A Laird
Policy Owner:	Corporate Governance
Approval Date:	20/09/2021
Approved By:	OLG Board

### Revision History

Rev. Nº	Date	Description of Change
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1		
2		
3		
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### Referenced Documents

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