
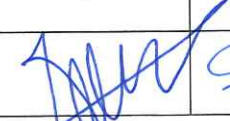





## PREVENTION OF MODERN SLAVERY PROCEDURE OARC -CORP-PRO-D005

Rev	Date	Description	Prepared by	Reviewed By	Approved by
00	26.2.2024	Initial Issue	HR Specialist	Manager - HR	CEO
		Signature			

**1. Definition:**

As defined broadly by UNO, Modern slavery is an umbrella term used for practices in which people are trapped, controlled, and exploited in situations they can't escape.

The UK's Modern Slavery Act (MSA) defines modern slavery as including the offenses of slavery, servitude, forced or compulsory labour, and human trafficking.

We define modern slavery as when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage.

**2. Objective:**

OARC is committed to preventing modern slavery within its operations and supply chains. This Prevention of Modern Slavery Procedure outlines our commitment to combatting these crimes and the actions we take to ensure that they do not occur within our organization or as a result of our business activities.

**3. Scope:**

We directly employ around 300 employees and 100 contractual employees as a combination of Local & Expat workers. We are confident that our own operations are free of modern slavery, forced labor and human trafficking. Employees across OARC work under comparable terms and conditions that are in accordance with Oman employment law, and we are an accredited Living Wage Employer. Health, safety and well-being support is in place for all staff including access to a network of Mental Health First Aiders and specialist counselling support.

**4. Statement:**

OARC acknowledges that modern slavery is a grave violation of human rights and a criminal offense under various national and international laws. We are committed to ensuring that slavery, human trafficking, forced labor, and child labor have no place in our organization or in any of our supply chains. We are dedicated to taking the necessary steps to eliminate these practices and to continuously improving our practices to combat modern slavery.

**5. Organisational Structure & Scope:**

This procedure applies to all employees, contractors, suppliers, and business partners of OARC.

## MODERN SLAVERY STATEMENT

Rev.

Issue Date

Page

OARC -CORP-PRO-D005

0

0

2 of 4

**Suppliers and Contractors:** The procedure extends to and includes all third-party entities that provide goods, services, or labor to the organization.

**Supply Chain Tiers:** It applies to all levels of the supply chain, including primary suppliers, secondary suppliers, and subcontractors. This ensures that the procedure covers all entities that may be involved in the production or delivery of goods or services.

### 6. Procedures:

This Prevention of Modern Slavery Procedure is provided to prevent and combat modern slavery in all its forms within its operations and supply chains. This procedure sets out our commitment to this goal and the principles we adhere to. We as an organization have a zero-tolerance approach to modern slavery. All employees, contractors, and business partners are required to comply with this procedure and all applicable laws and regulations related to modern slavery. We expect our suppliers, contractors, and business partners to uphold the same high standards in preventing modern slavery within their operations and supply chains.

Supplier code of conduct expects its suppliers and contractors to adhere to high ethical standards, including a commitment to preventing modern slavery. Suppliers and contractors are required to comply with all relevant laws and regulations related to modern slavery. Suppliers and contractors must provide the company with information about their policies, procedures, and efforts to prevent modern slavery within their operations and supply chains. Failure to comply with this procedure may result in corrective actions, including contract termination.

Employees are required to comply with all laws and regulations related to modern slavery. Employees are encouraged to report any concerns or suspicions related to modern slavery through designated reporting channels. The company will not tolerate retaliation against employees who report concerns in good faith.

Our whistleblower procedure is committed to protecting individuals who report concerns or suspicions related to modern slavery. Reports will be treated confidentially to the extent allowed by law. The company prohibits any form of retaliation against individuals who report concerns in good faith. Clear reporting channels are established for individuals to report concerns.

Any breach of the above policies is taken very seriously. For employees, this can result in disciplinary action, up to and including summary dismissal. For those who are members of professional regulatory bodies, a breach will also often result in a report of wrongdoing being made to the relevant professional body.

**7. Risk Assessment:**

OARC conducts regular risk assessments to identify areas within our operations and supply chains that may be susceptible to modern slavery. These assessments consider geographical locations, business sectors, and specific products or services. Identified risks are evaluated, and appropriate mitigating measures are implemented.

**8. Due Diligence:**

We conduct due diligence on suppliers and contractors, especially those operating in high-risk regions or industries. This due diligence includes:

- Assessing supplier and contractor policies and procedures related to modern slavery.
- Auditing and monitoring supplier and contractor compliance with this procedure.
- Engaging with suppliers and contractors to promote awareness and understanding of modern slavery issues.
- Taking corrective actions, including terminating relationships with suppliers or contractors that do not comply with our modern slavery requirements.

**9. Training:**

In order to promote awareness and prevent modern slavery within our supply chains and business, we provide training to relevant members. This training covers the entitlements they are due, as well as anti-sexual harassment policies. Our aim is to ensure a comprehensive understanding of the associated risks. Also, we provide training to employees and relevant stakeholders to raise awareness about modern slavery and to help them identify and report any suspicious activity.

**10. Reporting:**

Employees, suppliers, contractors, and other stakeholders are encouraged to report any concerns or suspicions regarding modern slavery within the organization or its supply chains. Reports can be made through the designated reporting channels, and anonymity will be maintained where required by law.

**11. Review & Monitoring:**

This Prevention of Modern Slavery Procedure will be reviewed annually or as circumstances require to ensure its effectiveness and relevance. Any necessary updates will be made, and progress in implementing the procedure will be monitored regularly.

**Revision:**

Revision No	Date	Pages	Revision Details
0	26.2.2024	4	Original

**Circulation / Distribution**

Department / Function

Identification	Location	Retention Period	Responsible

**Records**

**Related Document**

Document Title	Document No.