

	<b>Document Number:</b> A131	<b>Status:</b> Approved
	<b>Location:</b> QMS01	<b>Revision:</b> 1.1
<b>Title:</b> Prevention of Modern Slavery Policy Statement	<b>Approved by:</b> S. Ladbrook	<b>Date:</b> 19/02/2021

## Prevention of Modern Slavery Policy Statement

Onwave UK Limited (“the Company”) has a policy to ensure the Prevention of Modern Slavery Act is enforced and adhered to. The Company are committed to ensuring that we do not engage in any practices involving the use of child labour, forced labour, the exploitation of vulnerable people, or human trafficking. The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards. All Suppliers personnel, Employees and agency workers are paid in compliance with all applicable employment laws and minimum wage requirements.

The Company undergoes a process of steps to prevent slavery and human trafficking, we include it in our contracts with our subcontractors and suppliers and the Company will take all reasonable steps to prevent slavery and human trafficking in connection with our Supplier's businesses.

Onwave have a ridged suppliers onboarding process where a questionnaire is asked of suppliers via our sister companies procurement platform. Onwave has a four-step risk assessment tool. The risk assessment tool is all about prioritisation and efficiently addressing the risks that pose the greatest threat.

The Company will include in its contracts with its subcontractors and suppliers slavery and human trafficking provisions that are at least as onerous as those to which we are held by our Customers; and the Company will respond to all reasonable requests for information required for the purposes of completing an annual anti-slavery and human trafficking statement.

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The Company will permit any Customer, on reasonable notice during normal business hours, but without notice if there are reasonable grounds to suspect an instance of slavery and human trafficking, to access and take copies of records and any other information held at the premises and to meet with personnel and more generally to audit compliance with its obligations. The Company shall give all necessary assistance to the conduct of such audits during the term of this Agreement.

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy. If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or the Modern Slavery Compliance Manager in accordance with the Company's escalation procedure.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.



Stuart Ladbrook

**Chief Executive Officer (CEO)**

19/02/2021