

Optec Modern Slavery and Human Trafficking Statement

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Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

At Optec, we have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

Our Commitment

Optec are committed to ensuring that we, our suppliers, customers and contractors comply with the Modern Slavery Act 2015 and have put strict measures in place to ensure that no slavery is part of any of our business operations that includes our supply chains, goods and services. This applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

We are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff and want all staff to feel confident that they can expose wrongdoing without any risk to themselves.

Due Dilligence

As part of our initiative to identify and mitigate risk

- Where possible we build long standing relationships with manufacturers, suppliers and customers and make clear our expectations of business behaviour;
- We expect each entity in our supply chains to have suitable anti-slavery and human trafficking policies and processes, and we conduct third party due diligence in accordance with our procedures;
- We have in place robust systems to encourage the reporting of concerns and the protection of "whistle-blowers".
- Engaging in practices contributing to slavery, human trafficking or forced or compulsory labour are not tolerated. Any Optec employee who engages in conduct that results in a violation of applicable laws is subject to discipline, up to and including termination of

employment. Similarly, consultants, agents or third-party service providers that provide services to or on behalf of Optec should expect to have their contracts terminated if they violate anti-slavery laws.

- If a supplier is found to have committed the above, Optec will cease trading with them immediately and will report them to the relevant authorities, which could include, HMRC, Health and Safety Executive, Modern Slavery Helpline, the Police and the Home Office.

Optec use the following key performance indicators to measure how effective we have been in working to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain:

- Use of payroll and HR management systems to ensure that all employees are registered and paid fairly for the work they do;
- The building of relationships/partnerships with vendors, distributors and customers and their understanding of, and compliance with, applicable laws and Optec's expectations;
- Monitoring trainings, and the corresponding increase in employees' awareness of risk.

Responsibility

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it

The Senior Management Team have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Review Date: March 2021

Next Review Date: January 2022