

Oakford Anti-Slavery & Human Trafficking Policy – OP009

1. Policy Statement

Oakford are committed to running our business with honesty and integrity and in a legally compliant manner. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

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. We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

We expect the same high standards from all of our consultants, suppliers and business partners (together 'Suppliers'), and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our Suppliers to hold their own Suppliers to the same high standards.

This policy applies to our Suppliers and all persons working for us or on our behalf in any capacity, including employees at all levels, directors, employees, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and may be amended at any time.

2. Policy applicability

This policy covers all individuals working for Oakford Group, at all levels and grades, including senior managers, officers, directors, employees, contractors, consultants, trainees, homeworkers, part-time and fixed term employees (collectively referred to as workers in this policy). This policy is displayed on noticeboards and communicated to all employees and available on request to other interested parties.

3. Responsible Persons for policy implementation

The Managing Director has overall responsibility for the effective operation of this policy. Any questions concerning the operation of this policy should be directed to that role.

At board level, the Company Secretary will be responsible for overseeing and implementing the Policy and shall sign and publish the Company's annual Modern Slavery Statement.

All workers must comply with and support this policy. The Managing Director will have responsibility – which may be delegated – for informing all workers of the policy and of their role in the implementation and monitoring of the policy. They will also ensure all new workers are given access to this policy.

4. Policy

- 4.1 You must ensure that you read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 Employees of Oakford must notify their manager and Hannah Sharples as soon as possible if they believe or suspect that a breach of this policy has occurred, or may occur in the future. Suppliers must notify a representative of Oakford.
- 4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, please raise it with your Line Manager.
- 4.5 We aim 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. We are committed to ensuring no employee suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager or HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Policy.

5. Communication and awareness

- 5.1 This policy is available to all employees and is published on the company intranet.

- 5.2 Appropriate training is provided for employees in line with their roles and responsibilities.
- 5.3 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breaches of the policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other Suppliers, individuals and organisations working with us or on our behalf if they breach this policy.

7. Review

This policy is written by the Management team.

This policy is supported by the Board of Directors and company shareholders and reviewed regularly.

Signed for on behalf of Oakford Group	Date	Next Review Date
 Recoverable Signature  P Sharples Perry Sharples Managing Director Signed by: e8b24284-4e51-4f31-b1f4-8673849b093d	26 th October 2025	October 2026

8. Related documentation

- QP006 Document Control and Records Management Procedure.
- OP015 Disciplinary Policy
- OP016 Grievance Policy
- OP014 Harassment and Bullying Policy
- OP006 Whistle Blowing Policy