



Policy Statement

Oil Technics (Holdings) Ltd., also known as The OTL Group, is committed to combatting slavery and human trafficking in its business and supply chains and we make this statement to assist with compliance with the UK's Modern Slavery Act 2015.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

The OTL Group is a group of registered companies that manufacture and design high performance, innovative and niche solutions. The OTL Group covers the following companies and divisions:

- Oil Technics (Holdings) Ltd. (Parent Company) [also known as the OTL Group]
 - Oil Technics Ltd.
 - Oil Technics (Fire Fighting Products) Ltd.
 - Aberdeen Foam
 - Foam Testing Services
 - Bio Technics Ltd.
 - Endurocide®

Commitment

As our business has a turnover of less than £36 million, we do not have a legal obligation to produce a modern slavery statement. However:

- a) We agree that exploitation within any supply chains ending in the UK is a blight on our society, and we are committed to playing our part in eliminating exploitation;
- b) We understand that customers with obligations under the Modern Slavery Act 2015 cannot comply with those duties without our cooperation

The OTL Group acknowledges its responsibilities in relation to tackling modern slavery and understands and commits that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.

To that end, we confirm that we have examined our own business and to the extent that it is reasonably practicable, examined businesses within our supply chain. We confirm the following:

1. We confirm that within our own business, no relevant offence relating to slavery or human trafficking has been committed
2. We have made enquiries of businesses that supply directly to us and we are confident that no relevant offence is committed in that business
3. Insofar as it was reasonably practicable, we have examined our supply chains and confirm that we found no evidence of slavery or human trafficking

The OTL Group does not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports, or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the OTL Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases, exceeds those minimums in relation to its employees.

We are committed to be a Company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We aim to take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Consistent with our risk-based approach we may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Modern Slavery Policy
 - Suppliers engaging workers through a third party to obtain that third party's agreement to adhere to our Policy
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with this policy.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of the breaches being remediated (considering whether this may represent the best outcome for those individuals impacted by the breach), through to terminating the business relationship entirely.
- We continue to remain committed to implementing systems and controls aimed at ensuring that modern slavery does not take place anywhere within our organisation, or in any of our supply chains and we expect that our suppliers will hold their own suppliers to the same high standards

Definitions

Modern slavery refers to a wide range of exploitative crimes and violations of fundamental human rights. Whilst there are many different definitions of what 'modern slavery', or 'contemporary slavery' is, for the purposes of this policy the Company considers that term modern slavery encompasses a range of exploitative practices, including, but not limited to:

- Human trafficking;
- Slavery;
- Child labour & child slavery;
- Forced or compulsory labour
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement;

- Debt bondage or bonded labour.

For the purposes of this policy, the Company also recognises the following definitions:

Human trafficking:

The act of recruiting, transporting, transferring, harbouring or receiving a person by improper means (e.g. threat, use of force, deception, fraud, coercion or abuse), for an improper purpose including forced labour, or sexual exploitation.

Slavery & Slavery like practices:

Slavery is defined in the UN’s Slavery Convention as the status or condition of a person over whom any or all the powers attaching to the right of ownership are exercised. It has also been agreed that there are certain ‘slavery-like practices’ which remain a persistent problem, such as debt bondage/bonded labour, forced labour, servile marriage, sale or exploitation of children and descent-based slavery.

Debt bondage / Bonded labour:

When one person has pledged their labour (or that of someone under their control) to repay a debt on money owed in circumstances where the fair value of the labour is not reasonably applied to reducing the debt, or length of debt; or the length & nature of the service is not limited or defined. This results in loss of control over both the conditions of their employment and their debt. The debt can often be passed onto the next generation.

Forced labour:

When work or service is taken from a person under the menace of a penalty and for which the person has not offered themselves voluntarily, so that the person is forced to work against their will.

Sources:

Modern Slavery Act 2015 (UK), International Labour Organisation (ILO), UNODC, The Walk Free Foundation.

Julia Brown,
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