

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.

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, 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.

This policy has been reviewed in line with the UK Government's updated Modern Slavery Statement guidance (March 2025) and Procurement Policy Note 02/23. It sets out the steps taken or will be taken by the OTL Group during the 2025/26 financial year. The OTL Group's acknowledges its responsibilities in relation to preventing modern slavery with an understanding that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.

The OTL Group

The OTL Group is a group of registered limited 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®

Our Supply Chain

We appreciate that supply chains present the greatest risk of Slavery and Human Trafficking, so our relationship with suppliers is a critical part of our commitment to eliminating modern slavery/

The OTL Group contracts annually with approximately 270 suppliers, covering everything from IT hardware, software and associated support, through to raw material supply for the manufacture & blending of products, professional services and consultancy.

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. 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. We are able to go to Tier 1 in our analysis of our

Supply Chains. We have plans to map beyond Tier 1 over time, but acknowledge that as an SME there are limitations to the access we can scope;

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.

We have assessed the risk in our Supply Chain based on the Bureau of International Labor Affairs (ILAB) list of countries and products that have the highest risk of being produced by child and/or forced labour. If a Supplier should be based in a high-risk country and supplying high risk products or services, they are marked as being business critical on our Supplier's List and as being the highest risk. As such, additional measures are automatically put in place, which include, but are not limited to; regular site visits/audits, higher visibility of processes and procedures and assurances as to their commitment not to engage in any Modern Slavery activities. They are then closely monitored as part of our ISO Business Management KPIs.

Our engagement with suppliers includes the following:

- An assessment for every new supplier during the onboarding process, including acceptance by suppliers to comply with our Modern Slavery Statement. No instances of concern were identified.
- Requirement for all suppliers that are in scope of the Modern Slavery Act to provide a copy of their Modern Slavery Statement
- Incorporation of Modern Slavery contractual obligations and adherence with the Act across the OTL Group's terms and conditions for all contracts
- Completion of MSAT for UK government
- Operating a red, amber, green RAG assessment for all our suppliers, to help alert staff when working with highest-risk suppliers, so that action can be taken as a result of the RAG assessment, when appropriate. Action 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.

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 commitment and due diligence processes, audits of suppliers for their compliance with this policy will be conducted based on their criticality to the business.
- 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

Our Internal Operations

The OTL Group has a responsibility to ensure that our employees are not being exploited, that they are safe at work and that relevant employment, health & safety and human rights laws are followed. To ensure that there is no modern slavery or human trafficking with the OTL Group we have the following interventions in place:

- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave their employment. Employees are free to serve notice at any time.
- The OTL Group carries out verification of an employee's identity and right to work in the UK.
- The OTL Group complies with, or provides enhanced versions of, all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies and sickness, parental leave and minimum rest break periods.
- A Modern Slavery communications and Toolbox-Training has been introduced to make employees aware of their rights and how to spot and report signs of Modern Slavery. This training also includes the International Labour Organisation's (ILO) 11 indicators of forced labour and how these indicators can manifest,
- All employees are made aware of how to raise and report concerns, ranging from line management to whistleblowing measures.

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;

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- 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), Bureau of International Labor Affairs (ILAB), UNODC, The Walk Free Foundation, MSAT.

A handwritten signature in blue ink that reads "Hannah Evans".

Hannah Evans,

*General Manager, Bio Technics Ltd.,
signed on behalf of the OTL Group Managing Director (David Evans)
September 2025*