



OCTAVE MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1 PURPOSE

Octave is committed to conducting business ethically and responsibly, and to respecting internationally recognised human rights standards and principles.

The purpose of this Modern Slavery and Human Trafficking Policy (“Policy”) is to set out Octave’s approach to preventing modern slavery, human trafficking, forced or compulsory labour, and child labour in its business and supply chains. This Policy also provides guidance on how Personnel may identify and report concerns relating to these issues.

This Policy supports [Octave Code of Business Conduct and Ethics](#) and [Octave Supplier Code of Conduct](#). Together, these documents reflect Octave’s expectations for ethical conduct, respect for human rights, and responsible business practices.

Octave is committed to complying with applicable laws and regulations addressing modern slavery, human trafficking, forced or compulsory labour, and child labour in the jurisdictions in which it operates. Where required by applicable law, Octave will publish a slavery and human trafficking statement or equivalent disclosure describing the steps taken during the relevant financial year to address modern slavery and human trafficking risks in its business and supply chains.

2 APPLICABILITY

This Policy applies to all directors, officers, employees, and third parties acting on Octave’s behalf (“Personnel”), whereby Octave comprises Octave Intelligence plc, its subsidiaries, and joint ventures where it exercises management control.

Octave expects Personnel to act in accordance with this Policy and to avoid any conduct that may cause or contribute to modern slavery, human trafficking, forced or compulsory labour, or child labour.

Octave also expects suppliers, contractors, consultants, agents, distributors, business partners, and other third parties with whom Octave conducts business to uphold standards consistent with this Policy and with Octave’s Supplier Code of Conduct.

3 DEFINITIONS

For the purposes of this Policy:

“Modern Slavery” means severe forms of exploitation in which a person is deprived of their liberty or freedom in order to be exploited for personal or commercial gain. It includes slavery, servitude, forced or compulsory labour, and human trafficking.

“Human Trafficking” means the recruitment, transportation, transfer, harbouring, or receipt of persons through the use or threat of force, coercion, deception, abuse of power, abuse of a position of vulnerability, or other improper means for the purpose of exploitation.

“Forced or Compulsory Labour” means work or services that a person is required to perform under threat of penalty and for which the person has not offered themselves voluntarily.

“Child Labour” means work performed by children that is prohibited under applicable law, or that is likely to be harmful to a child’s health, safety, education, development, or wellbeing.

4 POLICY COMMITMENT

Octave does not tolerate modern slavery, human trafficking, forced or compulsory labour, or child labour in its business or supply chains.

Personnel must not cause, contribute to, facilitate, or knowingly benefit from any practice that constitutes or may constitute modern slavery, human trafficking, forced or compulsory labour, or child labour.



This includes, without limitation:

- a) deceiving workers or making false promises during recruitment;
- b) charging recruitment fees or requiring workers to pay deposits or security fees as a condition of work;
- c) withholding access to passports, identity papers, travel documents, or other personal documents;
- d) failing to pay wages, salaries, or benefits accurately and on time in accordance with applicable law;
- e) restricting workers' freedom of movement or preventing them from leaving the workplace;
- f) requiring workers to work excessive hours or overtime in breach of applicable law;
- g) using intimidation, threats, coercion, violence, harassment, or abuse in connection with work; and
- h) using child labour in breach of applicable law.

Personnel are expected to remain alert to potential indicators of modern slavery and human trafficking in Octave's business and supply chains and to report concerns in accordance with this Policy.

5 SUPPLIER AND BUSINESS PARTNER EXPECTATIONS

Octave expects suppliers, contractors, consultants, agents, distributors, business partners, and other third parties with whom Octave conducts business to conduct their activities ethically, responsibly, and in compliance with applicable laws.

Octave's Supplier Code of Conduct sets out standards for applicable suppliers and business partners, including expectations relating to human rights, labour practices, ethical conduct, and compliance with applicable laws.

Among other principles, applicable suppliers and business partners are expected to:

- a) avoid any form of modern slavery, human trafficking, forced or compulsory labour, or child labour;
- b) comply with legally mandated working hours, wages, benefits, and employment conditions;
- c) respect workers' rights to freedom of association and collective bargaining, in accordance with applicable law;
- d) prohibit harassment, abuse, intimidation, and unlawful discrimination; and
- e) maintain management systems and controls appropriate to the size, nature, and risk profile of their business to support compliance with applicable requirements.

Where applicable, suppliers and business partners are expected to ensure that their own suppliers and subcontractors adhere to standards comparable to those set out in Octave's Supplier Code of Conduct.

6 DUE DILIGENCE, RISK ASSESSMENT AND MANAGEMENT

Octave applies a risk-based approach to supplier and business partner due diligence.

Before engaging applicable suppliers or business partners, Octave may conduct due diligence proportionate to the nature of the relationship and identified risk factors, such as the country of operation, type of goods or services, transaction structure, and other relevant risk indicators.

Octave's supplier selection process may consider factors such as commercial competitiveness, competence, technology, process, management, logistics, quality, continuity, and investments in continuous improvement. Where relevant, Octave may also consider alignment with responsible business standards, including human rights, labour rights, environmental responsibility, and anti-corruption principles.

Octave may use mechanisms such as supplier self-assessments, surveys, contractual commitments, site visits, audits, restricted party screening, or other appropriate measures to assess and manage compliance risks, including risks relating to modern slavery and human trafficking.

If Octave identifies concerns relating to modern slavery, human trafficking, forced or compulsory labour, or child labour, Octave may engage with the relevant party and require appropriate corrective action. Significant or recurring breaches, failure to implement corrective action, or lack of cooperation may result in reduction or termination of business with the relevant party, subject to applicable contractual rights and legal requirements.



7 TRAINING AND COMMUNICATION

Octave communicates its expectations on ethical conduct, human rights, and responsible business practices through its Code of Business Conduct and Ethics, Supplier Code of Conduct, and related compliance communications.

Managers are expected to take reasonable steps to ensure that Personnel reporting to them are aware of this Policy and understand their responsibility to raise concerns where appropriate.

Octave may provide training or awareness materials on modern slavery and human trafficking risks to Personnel whose roles are relevant to supply chain management, procurement, compliance, human resources, or other higher-risk activities.

Applicable suppliers and business partners are expected to communicate relevant requirements to their personnel and, where applicable, to their own suppliers and subcontractors.

8 MONITORING AND EFFECTIVENESS

Octave may monitor the effectiveness of measures taken to address modern slavery and human trafficking risks in its business and supply chains.

This may include, as appropriate:

- a) reports or concerns received from Personnel, suppliers, business partners, the public, or competent authorities;
- b) outcomes of supplier or business partner due diligence;
- c) completion of relevant training or awareness activities;
- d) supplier confirmations, self-assessments, surveys, audits, or other review mechanisms;
- e) corrective actions requested and implemented; and
- f) material issues identified through compliance reviews, investigations, or risk assessments.

Monitoring activities will be proportionate to the nature and level of risk identified and may evolve as Octave's business, supply chain, and legal obligations develop.

9 RAISING CONCERNS

Personnel, suppliers, business partners, and other third parties are encouraged to report credible concerns relating to actual or suspected modern slavery, human trafficking, forced or compulsory labour, or child labour. Reports may be made through Octave's established reporting channels. Information on available reporting channels, confidentiality protections, and non-retaliation safeguards is available on Octave's [website](#).

Reports are reviewed and investigated in accordance with the Octave's Speak Up Policy and related procedures.

10 BREACHES AND CORRECTIVE ACTION

Octave will review reported concerns and may take appropriate action based on the nature and severity of the issue, the parties involved, the level of risk, and applicable legal and contractual requirements.

Corrective action may include, as appropriate:

- a) requesting further information or clarification;
- b) requiring remedial steps or a corrective action plan;
- c) increasing monitoring or review of the relevant relationship;
- d) suspending or restricting activity with the relevant party;
- e) reducing or terminating business with a supplier, business partner, or other third party; and/or
- f) taking disciplinary action against Personnel, up to and including termination of employment, subject to applicable law.



Where appropriate, Octave may also report matters to competent authorities or cooperate with law enforcement or regulatory agencies.

11 ROLES AND RESPONSIBILITIES

All Personnel are responsible for complying with this Policy, acting ethically, and raising concerns where they become aware of actual or suspected modern slavery, human trafficking, forced or compulsory labour, or child labour.

Managers are responsible for taking reasonable steps to ensure that Personnel reporting to them are aware of this Policy and understand the importance of reporting concerns.

The Compliance function is responsible for supporting the implementation of this Policy, reviewing reported concerns, advising on risk-based due diligence and corrective actions, and maintaining appropriate compliance records.

Personnel involved in procurement, supplier management, human resources, legal, compliance, finance, and other relevant functions are responsible for applying applicable procedures and controls within their areas of responsibility.