

Modern Slavery Statement OASIS Group

A Organisation structure, scope and supply chains

OASIS provides information management services across a range of jurisdictions in Europe including but not limited to the Republic of Ireland, the UK, Belgium, the Netherlands and Poland.

The scope of this statement applies to all operations and functions of Offsite Archive Storage and Integrated Services Limited and its subsidiaries (hereafter referred to as "OASIS").

OASIS does not operate in or provide products and services in high-risk countries where modern slavery is prevalent. OASIS provides most of its products and services directly, it only makes use of a small number of suppliers which include but are not limited to service providers for recruitment, IT and real estate management. These suppliers are engaged predominantly in the UK and the EU on long-term contracts.

B Definitions

OASIS considers that modern slavery encompasses:

- human trafficking
- child labour
- forced or compulsory labour, through mental or physical threat, coercion or more subtle forms of compulsion
- debt bondage, when a person is forced to work off a debt and they are working for very little or no pay with no means to repay it
- 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
- having restriction placed on freedom of association.

C Commitment

OASIS acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the legislation across the jurisdictions in which the business operates. OASIS understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

OASIS promotes ethical business practices and policies that protect workers from being abused and exploited in their own organisation and global supply chains.

OASIS has zero tolerance to slavery and human trafficking and does not enter into business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to OASIS in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. OASIS strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in each of the jurisdictions the business operates within.

OASIS ensures that any products or services it either provides or procures are of good sustainable quality and are ethically sourced.

D Potential Exposure and Risk Management

OASIS carries out regular risk assessments of its operations and supply chain which includes assessing its potential exposure to modern slavery, this forms part of our wider governance framework and our integrated approach to risk management.

Risks have been assessed throughout the full product and services lifecycle both internally and externally, starting from defining contract requirements before it is awarded or won, through to procuring products and services, management of the contract and supplier relationships, and reviewing the end of the contract.

All risks and mitigating actions are recorded in the OASIS risk register and are reviewed by the Board of Directors, the Executive team and senior management.

The risk and exposure to OASIS with regard to modern slavery is deemed minimal due to the sectors in which it operates, the nature and location of its operations, and its services and supply chain partners, nonetheless it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it. These are described below.

E Steps

This statement sets out the steps that OASIS has taken to ensure that modern slavery or human trafficking does not take place in any part of its business or supply chains.

- OASIS has robust recruitment and vetting processes for new hires which includes background checks where local laws allow. When hiring temporary workers, OASIS only uses reputable employment agencies who are vetted and approved in accordance with our procurement processes as outlined below. These agencies also carry out background checks on these workers where local laws allow. OASIS prohibits the use of worker-paid recruitment fees.
- OASIS pays everyone fairly above the statutory minimum rate of pay, , overtime is only ever offered as an optional benefit. Every Team Member is offered a range of benefits to supplement their salary, including those relating to lifestyle and wellbeing. Every Team Member is provided with a healthy and safe work environment, including sufficient rest breaks. Any threats or acts of violence, harassment, intimidation or discrimination will not be tolerated.
- OASIS promotes and supports freedom of movement and freedom of association for every Team Member. If any Team Member belongs to a trade union or other form of representation, their rights to do so will be protected and they will not be disadvantaged.
- OASIS operates procurement processes which ensure good planning, fair terms and conditions and pricing, and payment, this reduces the risk of demands or pressures being placed on suppliers which could lead to them violating modern slavery laws. All new suppliers are subject to robust due diligence processes. Before they are approved, suppliers must sign a contract and OASIS policies which include their commitment to complying with modern slavery laws. After approval, they are monitored to ensure that they remain fit for purpose and in line with relevant regulations and legislation and OASIS values and policies. These policies and processes are validated via regular reviews and internal and external audits.
- OASIS has long-term and trusted relationships with its suppliers. OASIS has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.
- Team members with responsibility for hiring team members and/or appointing and monitoring suppliers will be provided with full training on modern slavery so that they are aware of, understand the importance of and are able to identify and manage any risks to compliance with modern slavery laws in any of its operations or supply chain, and report any concerns.
- OASIS has developed an Environment Social and Governance (ESG) programme which provides the framework to holds itself to account to act responsibly, ethically and sustainably in all its operations and supply chain.
- KPIs have been assessed to ensure that they do not make the business and supply chain vulnerable to or create pressures that could lead to modern slavery.

F Policies

OASIS has the following policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business, and to ensure that business is conducted in an ethical and transparent manner;

- Health and Safety policy
- Environment Social Governance (ESG) Policy
- Recruitment Policy
- Equal Opportunities Policy
- Speak Up Policy
- Disciplinary and Disciplinary Dismissal Policy
- Grievance Policy
- Code of Conduct Business Ethics policy (including labour standards and modern slavery) for both team members and suppliers
- Flexible Working Policy
- Working from Home Policy
- Procurement policy

These policies are supported by the Board of Directors and approved by the Executive management team.

All policies are communicated and made available to all team members through the company's document management system or noticeboards.

The Group Compliance team ensures that all policies and procedures relating to modern slavery are fit for purpose and approved by senior management. OASIS continuously reviews and updates all of its policies.

G Continual Improvement and effectiveness

Over the last year we have taken the following actions to improve how we manage modern slavery risks in our business and supply chain:

- started a review of our supply chain to consolidate and reduce the number of suppliers that we use (whilst ensuring there is sufficient contingency and continuity of service) in order to minimise the risk of modern slavery being introduced

- started a review of our procurement and due diligence processes to ensure that vetting and ongoing management is handled in accordance with each supplier's level of risk
- carried out a training needs analysis for modern slavery and identified those roles and departments which may require additional or specific training in relation to modern slavery
- carried out ongoing monthly monitoring of KPIs to ensure that they do not create undue pressure or make the business or our supply chain vulnerable to introducing modern slavery
- implemented monthly risk committees where modern slavery is considered and any risks are recorded and appropriately mitigated.

H Governance and compliance

The Board of Directors, the Chief Executive Officer and the Executive team have overall responsibility for the steps that OASIS takes to prevent modern slavery in its operations and supply chains.

OASIS has a Group Compliance team who monitors and audits these steps, the associated policies and procedures and OASIS' adherence to modern slavery laws. The Group Compliance team which includes the internal audit function, works closely with Human Resources, Commercial, Legal and Procurement functions to ensure that this statement is adhered to.

Any suspicions of modern slavery practices can be reported in line with the Speak Up (whistleblowing) policy via the anonymous telephone helpline or web portal. All reports will be investigated independently by senior management, and the appropriate action will be taken to mitigate any risks to modern slavery or to remedy any such acts, should they ever occur.

The Group Compliance team will hold OASIS to account for ensuring that appropriate and fair action is taken in accordance with relevant laws and that OASIS fulfils its obligations in this regard.

The Group internal audit function audits OASIS' compliance with this modern slavery statement and its associated policies and procedures.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and all other relevant legislation in each of the jurisdictions in which OASIS operates. It constitutes OASIS' modern slavery and human trafficking statement for the financial year ending 31 October 2023. This statement has been approved by the Board of Directors.

Statement signed by:



Eddie Aston. Chief Executive Officer.

OASIS Group

Date: 29/04/2024