

# POL HR 001 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, 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 has access to the Employee Assistance Programme for free confidential support on a range of matters.
- 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. We have a SpeakUp policy and confidential helpline for concerns to be reported, in addition to our Grievance procedure.
- 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 follows a procurement process that emphasises careful planning, fair terms and conditions, competitive pricing, and timely payments. This approach helps mitigate the risk of undue pressure on suppliers, which could lead to violations of modern slavery laws. We expect all suppliers to have their own policy in place to ensure compliance with modern slavery laws and our contracts with suppliers reference adherence to modern slavery laws. If a supplier does not have an existing policy, they are required to sign OASIS's modern slavery policy.
- Before being approved, all new suppliers undergo rigorous due diligence, including signing a contract that outlines their commitment to complying with modern slavery legislation. Once approved, suppliers are regularly monitored to ensure they continue to meet our standards and remain compliant with relevant laws, regulations, and OASIS values. These processes are reviewed and validated through internal and external audits.
- OASIS has established long-term, trusted relationships with its suppliers. To the best of its knowledge, OASIS has not engaged in business with any organisation involved in modern slavery.
- Team members responsible for hiring staff and/or selecting and overseeing suppliers will receive comprehensive training on modern slavery. This will ensure they are informed about its significance, able to identify potential risks, and equipped to manage compliance with modern slavery laws across OASIS's operations and supply chain, while also being prepared to report any concerns.
- OASIS has established an Environment, Social, and Governance (ESG) programme that serves as a framework to ensure the company acts responsibly, ethically, and sustainably across 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 past year, we have taken the following steps to enhance our management of modern slavery risks within our business and supply chain:

- Initiated a review of our supply chain to streamline and reduce the number of suppliers we engage with, ensuring adequate contingency and continuity of service, while minimising the risk of modern slavery being introduced.
- Began a comprehensive review of our procurement and due diligence processes to ensure that supplier vetting and ongoing management are tailored to the level of risk posed by each supplier.
- Conducted a training needs analysis for modern slavery, identifying specific roles and departments that may require additional or specialised training on the issue.
- Implemented ongoing monthly monitoring of key performance indicators (KPIs) to ensure they do not create undue pressure or increase the risk of modern slavery within our business or supply chain.
- Established risk committees where modern slavery risks are reviewed, documented, and mitigated as necessary.

This approach reflects our ongoing commitment to minimising modern slavery risks throughout our operations.

## 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 2024. This statement has been approved by the Board of Directors.

Statement signed by:

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Eddie Aston. Chief Executive Officer.

OASIS Group

Date: 29/04/2025

## Document history

### Revision history

Version	Date	Detail	Author
1.0	30/11/2021	Format brought into line with policy/procedural documents. Content updated for 2021.	Kelli Isherwood, Group Quality, Compliance and Audit Specialist
2.0	11/07/2022	Reviewed and updated for compliance with the legal requirements to publish a Modern Slavery Statement in the UK	Nicola Simpson, Group Compliance and Audit Director
2.1	07/08/2023	Reviewed and updated for compliance with the legal requirements to publish a Modern Slavery Statement in the UK	Nicola Simpson, Group Compliance and Audit Director
2.2	24/04/2024	Reviewed and updated for compliance with the legal requirements to publish a Modern Slavery Statement in the UK. Updated with actions taken to improve effectiveness for combatting modern slavery.	Nicola Simpson, Group Compliance and Audit Director
2.3	28/03/2025	Reviewed and updated. Updated with actions taken to improve effectiveness for combatting modern slavery. Policy reference and risk rating added.	Ashleigh McKenna, HR Business Partner

### Review history

Version	Date	Comments	Reviewer
1.0	30/11/2021	Reviewed for 2021.	Kelli Isherwood, Group Quality, Compliance and Audit Specialist
2.0	20/07/2022	Legal review by Clark's Legal	Senior Solicitor
2.0	01/08/2022	Reviewed and minor edit	Lorraine Williams, Head of HR
2.0	02/08/2022	Reviewed and minor edit	Ian O'Donovan, CFO
2.1	15/08/2023	Reviewed and content check	Ian O'Donovan, CFO
	16/08/2023	Reviewed and minor edit	Lorraine Williams, Head of HR
2.2	29/04/2024	Reviewed and approved	Sarah Vidgen, Chief People Officer, HR
2.3	17/04/2025	Reviewed and approved	Nicola Simpson, Group Compliance and Audit Director
2.3	28/04/2025	Reviewed and approved	Sarah Vidgen, Chief People Officer