



BSO Modern Slavery Statement

1 INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. At **BSO Network ("BSO")**, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, customers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

2 OUR BUSINESS AND SUPPLY CHAINS

We establish a relationship of trust and integrity with all our customers and suppliers, which is built upon mutually beneficial factors. Our partner selection and on-boarding procedure includes due diligence of the partner's reputation, respect for the law, compliance with health, safety and environmental standards, and references. We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers and/or customers, but if we were, then we would act immediately against the partner and report it to the authorities.

3 RESPONSIBILITY FOR THE POLICY

BSO has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. BSO has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.



4 OUR POLICIES

BSO operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Ethics- our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our services.

5 COMPLIANCE WITH THE POLICY

Employees must ensure they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or under our control. Employees, directors and partners are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees must notify their line manager OR a company Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future in accordance with our Whistleblowing Policy. Employees are encouraged to raise any concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. We will give support and guidance to our suppliers, customers and partners to help them address coercive, abusive and exploitative work practices in their own business and supply chains. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. This Modern (Anti) Slavery Policy and Statement is intended for our businesses and entities in all countries, especially the United Kingdom.

6 COMMUNICATION & AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and employees. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.



7 BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

8 BREACHES OF THIS POLICY

Each year, we will conduct a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers/partners
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

Michael OURABAH, CEO