

## Anti-Bribery and Corruption Policy Statement

### Statement

O.C.O Technology Group Ltd (O.C.O) will take all measures necessary to prevent bribery and corruption within its business activities.

Very generally, this is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. This could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker rather than by what can legitimately be offered as part of our normal business procedures.

This statement and the related Procedure apply equally to all Directors and employees and to external organisations and individuals such as contractors and customers. O.C.O has a zero-tolerance approach to fraud, bribery, blackmail, extortion and all other corrupt business practices within the Company.

O.C.O's Board of Directors fully endorse and support this Policy Statement together with all related policies and strategies. We consider it to be part of the O.C.O culture and as such it is the responsibility of all our employees to adhere to this policy.

This Policy Statement covers all O.C.O activities and will be reviewed annually to ensure it remains effective and delivers continual improvement.

This Policy, alongside corresponding policies may be available to customers, shareholders, staff and the public at large should they require.

Signed .....  ..... Date: **December 2024**  
(Chief Executive Officer)

# Technical Competence Policy Statement



## O.C.O Statement:

O.C.O is committed to ensuring that all our employees have the knowledge and skills to fulfil their responsibilities competently, safely, and effectively. To ensure the highest standards of health and safety and quality are met, and that all relevant requirements are complied with.

## Our Commitment:

O.C.O aims to operate all our facilities to the highest standards, ensuring all relevant requirements are complied with. To achieve this, we recognise that we must develop a strong and sustainable culture of training and competence that will allow us to grow our people to meet the business needs.

O.C.O will achieve this commitment by operating a management system that complies with the Competence Management System (CMS) requirements and other standards that the organisation subscribes to, including ISO 14001, ISO 9001, ISO 45001, and BES 6001. We will do this by:

- Appointing the Senior Leadership Team to deliver the requirements of this policy and develop procedures to ensure we create a strong training culture.
- Ensuring this policy is communicated to all our people and that they are aware of their responsibilities in relation to their roles.
- Maintaining competence, identifying, and providing adequate training to ensure our people can fulfil their roles safely and competently.
- Complying with applicable legal and regulatory requirements, including the requirements of environmental permits and associated guidance.
- Setting and reviewing objectives and targets at a departmental, functional, and individual level that allow for the continual improvement of the management system.
- Monitoring and checking our performance to ensure that we are fully compliant with our standards, the requirements, and our expectations.
- Regularly reviewing this policy and the CMS to ensure that they are still relevant and reflect the continuous changes and developments in the business.

Signed

Steve Greig  
Chief Executive Officer

## Anti-Slavery and Human Trafficking Policy Statement

### Statement

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015. It sets out the actions O.C.O Technology Group Ltd (O.C.O) has taken to identify all potential modern slavery risks and the provisions to ensure there continues to be no slavery or human trafficking in the business and supply chains.

At O.C.O we are committed to delivering our services responsibly and sustainably, ensuring we meet the needs of our employees and customers while managing the social, environmental and economic impacts of our operations and services. We recognise that by working with our customers, employees and the communities in which we serve, we can make a greater contribution to a more sustainable society.

We take active measures to promote ethical and lawful employment practices and as such, we are committed to a work environment free from human trafficking and slavery. Slavery and forced labour is proscribed in our business and we will not consciously employ anyone or engage the services of a supplier who uses unlawful child labour and/or forced labour.

As a business we continue to review our supply chain obligations and remind our suppliers and contractors that failure to comply with the Modern Slavery Act 2015 will result in termination of our contract with immediate effect, without compensation.

We use agency labour procured through third party providers. We have introduced appropriate steps to ensure third party labour providers are assessed against their obligations in relation to the Modern Slavery Act 2015. As part of our procurement process we require the provision of their anti-slavery and human trafficking statements, and/or examples of how they adhere to their obligations by completing a pre-approval compliance questionnaire.

Our suppliers and contractors are required to adhere to the highest standard of ethics and demonstrate they provide safe working conditions; treat workers with dignity and respect; act ethically and within the law when using labour. Any contractor who acts in an unlawful manner will have their contracts terminated immediately and will be removed from the Company's approved supplier system.

Our Compliance and Human Resources teams periodically review our policies and procedures, assess risks, and ensure suppliers, contractors and third party labour providers are routinely audited.

This Policy, alongside corresponding policies for Environment and Quality may be available to customers, shareholders, staff and the public at large should they require.

Signed .....  ..... Date: **December 2024**  
(Chief Executive Officer)