

Modern Slavery Act 2015 Statement for Oakray Limited

Oakray Ltd is dedicated to preventing modern slavery and human trafficking from taking place within its business and supply chain and we place the same expectation on our suppliers.

As a company, Oakray Limited maintains relationships with a large number of sub-contractors as well as directly employing staff.

PURPOSE OF THIS STATEMENT

The statement is made pursuant to section 54() of the Modern Slavery Act 2015 (the Act). Oakray Lt, although not obliged by legal requirements, takes its responsibilities in relation to the identification, prevention and reporting of modern slavery and human trafficking very seriously and has a zero-tolerance approach to the abuse of human rights.

POLICIES

In relation to modern slavery and human trafficking, Oakray Limited has a number of policies, which are relevant to preventing instances and managing the risks of modern slavery occurring in its business or its supply chains and only uses approved sub-contractors to carry out work on their behalf.

Anti-Bribery Policy:

Oakray Limited will not tolerate bribery and is also committed to deterring fraud and trading only with reputable businesses.

The Bribery Act 2010 came into force on 1st July 2011. The Act creates two general offences of:

- (a) giving, promising, or offering a bribe and
- (b) requesting or receiving a bribe.

It also sets out 2 further offences:

- (c) the bribery of a foreign public official and
- (d) failure of a commercial organisation to prevent bribery (the corporate offence) which includes registered providers, can lead to an unlimited fine if committed by a member of staff or associated person (this includes agents and joint venture partners).

Anti-Harassment and Bullying Policy:

Oakray Limited recognises that harassment and bullying are potential problems for the organisation and we are committed to providing a working environment in which everyone is treated with dignity, fairness and respect and are valued for their contribution.

Dignity at work Policy:

Our individual commitment to the work of Oakray is matched by our collective commitment to shared values. These values include the commitment to treat others with respect and to respect the culture and beliefs of others. We respect the dignity of all employees and value the contribution they make in the workplace. Any form of unwanted conduct, which has the purpose and effect of violating an employees' dignity or that creates an intimidating, hostile, degrading, humiliating or offensive environment for employees is unacceptable and will not be tolerated or condoned.

Equality and Diversity Policy:

Oakray Limited is committed to providing equality and diversity in line with the Equality Act 2010. We believe that our success is a direct result of the experience and quality of our employees. We are committed to opportunities in recruitment, remuneration, training and promotion of employees and to eliminating discrimination in the workplace on the grounds of any protected characteristics.

We are committed to eliminating discrimination amongst our workforce and to comply with the Equality Act.

Oakray Limited aims to value diversity in all that we do, and to go beyond tackling discrimination by demonstrating best practice; by treating people fairly and by accepting and embracing their diversity. By doing so we aim to improve our market competitiveness, foster innovation, enhance our corporate social responsibilities and create an inclusive and positive working environment for our all our employees. It is the policy of Oakray Limited that no person acting on our behalf shall discriminate in any situation against another individual or group, directly or indirectly because of any protected characteristics.

Grievance Policy

Oakray recognises there may be times when an employee feels aggrieved about working practices or relations with work colleagues or any other concerns, problems or complaints, which an employee has concerning any aspect of their employment. Most grievances can be resolved quickly and informally through discussion with line managers. If this does not resolve the problem an employee may raise a formal grievance under the procedure outlined in this policy.

Safeguarding Policy:

The purpose of this policy is to ensure that there is an overarching company approach to safeguarding, raise the overall awareness of safeguarding and the actions to take if it is suspected that abuse is taking place.

Whistleblowing Policy:

Oakray is committed to maintaining the highest levels of openness, probity and accountability amongst Oakray staff. It is therefore important to Oakray that any fraud, misconduct or wrongdoing is reported and properly dealt with.

Oakray encourage any member of staff who has a reasonable belief that an incident of malpractice has occurred, is occurring or is likely to occur within Oakray to raise their concerns at the earliest opportunity.

DUE DILIGENCE PROCESSES RELATING TO SLAVERY AND HUMAN TRAFFICKING

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, we adopt the following due diligence procedures:

- Training for all Oakray staff on the risks of modern slavery and how to identify signs of slavery and human trafficking
- Pre-employment checks for all new staff to ensure that they are eligible to work in the UK
- Approval procedure for all sub-contractors prior to carrying out work on behalf of Oakray Limited, acknowledging their responsibilities for adhering to our policies
- Only purchase and supply CE marked products from industry leading suppliers

We aim to:

- Identify, monitor and manage areas of potential risk in our business and supply chains
- Scrutinise any identified areas of risk within our business and supply chains
- Adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation and our supply chains
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

FURTHER ACTIONS, APPROVAL AND ENDORSEMENT

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Keeping our approval standards of sub-contractors under review to ensure sub-contractors are aware and adhere to Oakray's expectations in relation to the Modern Slavery and human trafficking.

**MODERN SLAVERY ACT 2015 STATEMENT FOR
OAKRAY LIMITED
POL029**



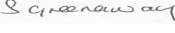
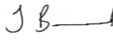
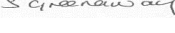
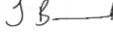

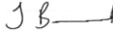


This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Oakray Limited's slavery and human trafficking statement.

Oakray recognises that this policy may not cover all circumstances which may arise when dealing with Modern Slavery issues, and reserves the right to vary the procedural aspects in individual cases with the agreement of the individual

Document History

(For previous version changes, please look to the document control spreadsheet)

Version Number	Date	Created by	Signature	Approved	Signature	Description	Review date
1	22/06/2021	Sandra Greenaway		Wayne Dejager		Annual Review, change of Director	22/06/2022
2	22/06/2021	Sandra Greenaway		James Barnard		Annual Review, Change of Director	08/06/23
3	08/06/2023	Sandra Greenaway		James Barnard		Annual Review	08/06/2024
4	08/06/2024	Sandra Greenaway		James Barnard		Annual Review	08/06/2025