



Anti-Trafficking / Slavery Policy

Last review 12/1/20

Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as enacted in the Modern Slavery Act 2015 ('the Act'). Owl Live is committed to a zero tolerance approach to modern slavery and to acting with integrity in all its dealings, relationships, and supply chains. It expects the same high standards from all its staff, suppliers, contractors, and those with whom it does business. This policy applies to all employees, workers, consultants, and other persons doing business with Owl Live including all its wholly owned companies, contractors, and suppliers. Owl Live acknowledges the risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour. Owl Live considers the risk of modern slavery to be low due to the nature of its supply chains, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following policy measures:

The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for Owl Live or under its control.

Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).

All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited.

Owl Live encourages anyone to raise any concerns about modern slavery and will support anyone who acts in good faith. Owl Live has a whistleblowing policy which can be used to report any instances of modern slavery.

Wherever we establish a risk, Owl Live will obtain warranties from suppliers that they are free of modern slavery (which can be passed on to subcontractors).

Owl Live will continue to develop its commitment to combat modern slavery and will provide staff training where appropriate.

Any breaches of this policy may result in Owl Live taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.