Omilia
Conversational Intelligence

Anti-Slavery Policy

Compliance & Ethics Programme

Corporate Governance, Risk & Compliance

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v2.0	August 2025	CGRC	Governance framework update
v2.1	April 2026	CGRC	Annual policy revision 2026: code updated (OPS→CGRC), owner updated, Applicable Laws section preserved, new §3.3 Remedial Action added from Disciplinary, boilerplate sections standardised, framework mapping table added

Regulatory & Framework Alignment

This table identifies the regulatory frameworks and specific controls that this policy satisfies. Only include rows for frameworks relevant to this policy.

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Framework	Relevant Controls / Clauses
SOC 2 Type II	CC1.1, CC1.4 (Commitment to Integrity, Ethics & Competency); CC9.2 (Vendor & Business Partner Risk Assessment)

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Table of Contents

1. Scope & Purpose....4
Purpose....4
Scope....4
2. Applicable Laws....4
3. Anti-Slavery Provisions....4
3.1. Identification of Victims....4
3.2. Omilia's Responsibilities....5
3.3. Remedial Action and Contractor Obligations....5
3.4. Child Labour....5
4. Disciplinary Consequences....6
5. Policy Revision....6
6. Reporting & Escalation....6
7. Roles....7
Policy Owner....7
Governance Roles....7

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1. Scope & Purpose

Purpose

Modern slavery is a crime and a grave violation of human rights. It encompasses four activities: slavery, servitude, forced or compulsory labour, and human trafficking. In all cases, vulnerable people are stripped of their dignity and basic freedoms and forced to work for someone else's gain. The most common forms occur in sectors such as supply chains, outsourced activities, cleaning and catering, corporate hospitality, and general recruitment.

Omilia has a zero-tolerance approach to slavery and human trafficking. We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chains. Omilia's anti-slavery policy reflects our commitment to act ethically and with integrity in all business relationships and to implement effective systems and controls to ensure modern slavery is not taking place anywhere in the organisation.

Scope

This policy applies to all employees directly employed by Omilia and its subsidiaries, and extends to all contractors performing services for, or on behalf of, any Omilia entity.

2. Applicable Laws

Omilia is active in numerous markets and must comply with the anti-slavery laws of several jurisdictions. This policy is intended to provide general principles and guidance with respect to anti-slavery. In some cases, the laws of the jurisdiction in which Omilia does business may vary from what is stated in this policy. All personnel should also consult and follow applicable local laws. Where local law requires a higher standard, the higher standard applies.

3.Anti-Slavery Provisions

3.1.Identification of Victims

There is no typical victim, and some victims do not understand they have been exploited or are entitled to help and support. The following indicators — which are not exhaustive — could trigger suspicion that a person may be a victim of modern slavery. Such a person:

- may not be in possession of their own passport, identification or travel documents;
- will allow others to speak for them when spoken to directly;
- will be withdrawn or appear frightened;
- does not seem to be able to contact friends or family freely;
- has limited social interaction or contact with people outside their immediate environment.

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A person may display a number of these indicators without necessarily being a victim of slavery or trafficking. If you have concerns, report them promptly in accordance with this policy.

3.2.Omilia's Responsibilities

Omilia expects all its employees and contractors to:

- implement this policy;
- remain vigilant in identifying circumstances where there is a risk that modern slavery might be occurring in any part of Omilia's business or supply chains;
- report any such circumstances in full and without delay;
- conduct their personal and domestic affairs in a way that ensures they are in no way connected with modern slavery, either through the commission of a criminal offence or through actions that may lead to, or facilitate, the commission of such an offence by others.

Omilia will support anyone who raises a genuine concern that modern slavery may be taking place in any part of its business or supply chains, even if that concern ultimately proves to be unfounded. No one will be penalised for raising a concern in good faith.

3.3.Remedial Action and Contractor Obligations

In the event that Omilia has a reasonable belief that modern slavery is occurring in any part of its business, Omilia will: put in place remedial action as soon as reasonably practicable with a view to ensuring that such modern slavery ceases to occur and that the victims are appropriately safeguarded; monitor the effectiveness of the remedial action taken, including the actions taken to safeguard the victims; and deal with the matter under its disciplinary procedures, which could result in the dismissal of any member of staff found to be responsible.

In the event that Omilia has a reasonable belief that modern slavery is occurring in the business or supply chains of any contractor, supplier, or other business partner, it will expect the relevant party: to be fully transparent and supply such information as Omilia may reasonably request; to put in place remedial action as soon as reasonably practicable; to monitor the effectiveness of that remedial action and safeguarding; and to report to Omilia at reasonable intervals on the effectiveness of the remedial action and any further steps taken to prevent recurrence.

Depending on the facts and the terms of the contract with the relevant party, Omilia may terminate or suspend the relationship, or otherwise cease, reduce, or mitigate its business with any contractor, supplier, or business partner where modern slavery is found to be occurring in their operations or supply chain.

3.4.Child Labour

International and local child labour laws prohibit the exploitation of children in the workforce. Omilia is committed to conducting business in a legal and ethical manner. Helping to stop child labour is fundamental to that commitment. Omilia requires all suppliers, partners, and

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vendors to follow the stricter of all applicable laws regarding child labour and to pass these requirements on to their own supply chains. Omilia will always apply the stricter law where more than one jurisdiction is relevant.

3.4.1. Young Children (under 15)

Omilia does not employ anyone younger than 15 years of age and will not do business with any organisation that employs children younger than 15. Where parents bring children to a workplace as part of skills education and introduction to a work environment, this is acceptable provided it does not deprive the child of schooling on a consistent basis and does not involve exposure to health or safety risks.

3.4.2. Older Children (15 and above)

Where children aged 15 or above are employed in jurisdictions where this is lawful, Omilia follows all applicable local and international standards. As a general rule, these individuals may work but must never engage in work that jeopardises their health, safety, schooling, or development. Omilia applies the higher standard where multiple laws apply.

4. Disciplinary Consequences

All employees are responsible for observing this policy and reporting any breaches to the Corporate GRC Team via the Corporate GRC Service Desk. Non-compliance may result in disciplinary action proportionate to the nature and severity of the violation, up to and including termination. All personnel — including employees, contractors, and third parties performing services for or on behalf of Omilia — are required to review and formally acknowledge their understanding of this policy upon commencement of engagement and at each annual re-certification. Completion of all related mandatory training is required to maintain compliance.

5. Policy Revision

This policy is reviewed at least annually, or on an ad hoc basis when material changes are required. The CGRC Team coordinates the review process, ensures regulatory alignment and version control, and submits proposed revisions to the Policy Owner for approval. Changes with broader legal, regulatory, or organisational implications are escalated to the CGRC Committee. Once approved, the updated document is published in the central document management system and relevant stakeholders are notified.

6. Reporting & Escalation

Any actual or suspected non-compliance with this policy must be reported immediately to the Policy Owner, the relevant functional lead, or directly to the Corporate GRC Team via the Corporate GRC Service Desk. The CGRC Team acts as a neutral coordinator — not an enforcement authority — and ensures the matter is documented, triaged, and tracked.

Unresolved issues, cross-departmental concerns, or matters posing significant legal, regulatory, reputational, or operational risk are escalated to the CGRC Committee. Critical matters involving

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senior leadership or major risk acceptances may be escalated to the CEO or the Board. All escalations are recorded in the CGRC escalation log and reviewed periodically.

7. Roles

Policy Owner

The Policy Owner is the primary steward of this document, responsible for its content, accuracy, relevance, and operational implementation. They ensure the policy remains current and aligned with applicable legal, regulatory, and organisational requirements, and they work with relevant departments and stakeholders to ensure the policy is understood and integrated into daily operations.

The Policy Owner for the Anti-Slavery Policy is the Corporate Governance, Risk and Compliance function. CGRC is responsible for the content, accuracy, and currency of this policy; for ensuring it remains aligned with applicable anti-slavery legislation and ethical supply chain standards; and for working with relevant departments and the CGRC Committee to ensure the policy is communicated, understood, and implemented across the organisation.

Governance Roles

The CGRC Team coordinates the policy lifecycle, ensures regulatory alignment, maintains the audit trail, and facilitates review and escalation. The CGRC Committee provides strategic oversight, serves as the ultimate escalation body, and reports to the Leadership Team, CEO, and Board of Directors. For a complete description of CGRC governance roles and responsibilities, refer to the Omilia Corporate Governance Framework.

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