Company Confidential Owner: Compliance Officer

Outsourced Professional Administration Limited

Voluntary Statement on Slavery and Human Trafficking

OPAL is a privately owned business providing administration and software services to the UK financial services sector. The firm is owned and controlled by individual shareholders.

We are committed to:

- ➤ Continuous improvement in our corporate and social responsibility (CSR) strategy
- ➤ Ensuring that our business and supply chains do not support slavery or human trafficking
- > Encouraging our clients and suppliers to assist and partner our strategic goals
- > To act in a socially responsible way
- Continually improve our performance and adherence to all legislation applicable to our business
- > To encourage our staff to be mindful of the effect of their actions on any natural resource and the environment

Our aims and purposes are:

To make clear to all our stakeholders what we mean by CSR and how we propose to work towards achieving optimum CSR. The CSR policy applies throughout the organisation from procurement service to output and governs our approach to all our activities.

- > We aim to be responsible
- > We aim to set an example

Our key Objectives and considerations in how we meet our CSR obligations are:

- We assess which social issues are of most relevance to our business and business functions
- We only operate in a way that safeguards against unfair business practices
- ➤ We actively encourage within the organisation to support local business suppliers and recruit locally and employ flexible and remote working to reduce overall carbon footprint

Corporate Governance

- ➤ We will share and declare information on personal and corporate conflicts of interest and seek guidance from higher authority before acting
- ➤ We are committed to ensuring that our business is conducted in all respects according to rigorous ethical, professional and legal standards
- All the laws that regulate and apply will be complied with

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We endeavour to ensure that stakeholders have confidence in the decision making and management process of procurement and how we run our business is undertaken by professional staff members that is managed through our T&C Scheme

- All groups and individuals with whom we have a business relationship will be treated in a fair and open manner
- ➤ Competition will be reasonable and based upon quality, value and integrity of the products and services being supplied

Environment

- Our objective is to reduce our impact on the environment through a commitment to continual improvement through our OPAL Environmental Action Focus (OPALEAF) initiative
- ➤ We will work with our suppliers and clients to reduce their impact on the environment
- > Our clients will be informed of the key issues involved during our regular governance meetings to reduce our carbon footprint further i.e. email rather than posting of documents, teleconferencing rather than travelling to each other's sites, actively encouraging electronic format rather than paper format
- ➤ We implement to take-back, recover, re-use and recycle as much as possible, printer cartridges, paper shredding and cardboard
- We now recycle plastic and cans where possible in the bins provided in the kitchen.
- ➤ We encourage and monitor "switch off" of all lights and electrical equipment when not in use. Spot checks are undertaken and reported back to employees to remind them of their responsibilities to reduce the overall carbon footprint
- ➤ We support flexible and remote working practices where possible to reduce the impact of commuting

Human Rights

➤ OPAL's business doesn't apply to the Human Rights Act, however our Ethos is that everyone is entitled to basic human rights, including food, water, shelter and a right to provide for your family. OPAL voluntarily produces a Slavery and Human Trafficking Statement, updated to reflect any relevant changes to the business or its practices. We regularly consult salary comparison data to ensure we are providing our staff with a fair and reasonable salary and benefits.

Equality and Diversity

- We do not condone any acts of discrimination on any grounds, whether race, religion or sex and supports equal opportunity within the workplace
- ➤ We encourage our staff and suppliers to actively celebrate their culture within the organisation i.e. Diwali, Chinese New Year and Ramadan
- Our flexible and remote working practices allow us to recruit from a wider pool of diverse talent

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➤ Our Policies on Equal Opportunities, Corporate Social Responsibility Policy and Whistleblowing are included within our Employee Handbook.

Sustainability

➤ We always seek to minimise the adverse environment effects of people travelling to and from our offices, by encouraging car share, remote and flexible working. Our offices are near main line stations, bike storage at the offices and teleconferencing wherever possible

Impact on Society

- We actively recruit locally and use local suppliers in our business requirements
- ➤ We understand our impact and image within our local environment
- ➤ We support local ventures, charities as well as nationwide charitable events like red nose day by holding dress down days and cake sales and competitions
- ➤ We support the holding of special events locally to embrace sport, leisure and teambuilding which include staff families and friends

Ethics and Ethical Trading

Within OPAL's business we are not involved in trading, however OPAL's ethos is to support businesses that are ethical in their trading and if applicable we will purchase from that business rather than a business that does not hold these values. i.e. Waitrose and Marks & Spencer actively encourages ethical trading, are where we normally purchase our Christmas gifts for the staff. Most of our suppliers are UK registered companies and none are involved in activities where slavery is prevalent.

Biodiversity

OPAL does not own any grounds or premises, but appreciates and supports local campaigns to protect green spaces.

Supply Chain

SFPL undertakes due diligence on its key suppliers. Although usually unable to impose our own T&C on the contractual arrangements we ensure that our suppliers terms include a commitment to abide by all applicable UK laws and regulations, if not an explicit Modern Slavery Policy.