



# Prevention of Modern Slavery Policy

Effective: December 2022

## Document Signoff

Role	Name	Signatory & Date
Prepared by	Chua Yu Xuan	 14 December 2022
Reviewed by	Philip Ye Shao Xin	 15 December 2022
Approved by	Roy Kirsopp	 15 December 2022

Document control

<b>Rev.</b>	<b>Change History</b>	<b>Author</b>	<b>Date</b>
1.0	Initial Release	Tammy Pang	Nov 2020
2.0	Revised document	Chua Yu Xuan	Dec 2022

## Table of Contents

1. MODERN SLAVERY STATEMENT.....	3
2. SCOPE.....	3
3. ROLES & RESPONSIBILITIES .....	3
3.1. EMPLOYEES.....	3
3.2. MANAGEMENT .....	4
3.3. BUSINESS PARTNERS .....	4
4. OUR BUSINESS & SUPPLY CHAIN.....	4
4.1. RECRUITMENT .....	4
4.2. PROCUREMENT & SUPPLY CHAIN MANAGEMENT.....	5
5. TRAINING & AWARENESS .....	5
6. RAISE CONCERNS AND SEEK GUIDANCE .....	6
7. REVIEW OF POLICY .....	6
ANNEX A: FORMS OF MODERN SLAVERY .....	7
ANNEX B: EXAMPLES OF RED FLAGS .....	8
ANNEX C: EDM I BUSINESS PARTNER'S CODE OF CONDUCT .....	8
ANNEX D: EDM I COMPLIANCE QUESTIONNAIRE .....	8

## **1. MODERN SLAVERY STATEMENT**

Modern slavery is a serious crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. At EDMI, we have a zero tolerance of Modern Slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain in compliance with Modern Slavery acts including but not limited to UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018.

EDMI, its subsidiaries and Business Partners are expected to ensure that they do not commit any forms of Slavery within their operations and supply chain with a non-exhaustive list of such acts provided in Annex A.

## **2. SCOPE**

This Statement applies to all of the following:

- i. EDMI Limited ("Company"), its subsidiaries and associated companies and joint ventures where the Company or its subsidiaries have controlling interest;
- ii. All directors, officers and employees (including full-time, part-time, contract and temporary) of the Company, its subsidiaries and associated companies and joint ventures where the Company or its subsidiaries have controlling interest (collectively referred as "Employees" in Policy); and
- iii. Any parties with business relationships with EDMI including but not limited to intermediaries such as agents, consultants, vendors, contractors, or any parties appointed to act on EDMI's behalf including but not limited to consultants, representatives, distributors, or any other person worldwide who are associated with EDMI (collectively referred as "Business Partners" in this Policy).

## **3. ROLES & RESPONSIBILITIES**

### **3.1. EMPLOYEES**

Employees are expected to complete Modern Slavery training annually, understand EDMI's Prevention of Modern Slavery Policy, and report any suspicions of violations to their Head of Department or Risk & Compliance Department.

### **3.2. MANAGEMENT**

Heads of Department and the Leads of the respective entities have overall responsibility for ensuring that they are not complicit in the violation of the Prevention of Modern Slavery Policy through the company, its group companies or its supply chains.

Osaki management will publish a yearly statement regarding EDM I's efforts to identify, prevent and mitigate modern slavery in their operations and supply chains covering:

- i. EDM I's Organisational structure, its business and its supply chain
- ii. Policies on modern slavery and human trafficking
- iii. Due diligence processes in relation to slavery and human trafficking in its business and supply chains
- iv. Parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk
- v. Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate
- vi. Training about slavery and human trafficking available to its staff

### **3.3. BUSINESS PARTNERS**

Business Partners are expected to understand and adhere to EDM I's Prevention of Modern Slavery Policy as well as report any suspicions of violations to EDM I Risk & Compliance Department or EDM I Whistleblowing channel.

## **4. OUR BUSINESS & SUPPLY CHAIN**

EDM I, its subsidiaries and Business Partners are expected to comply with the following when performing the respective functions

### **4.1. RECRUITMENT**

EDM I, its subsidiaries and Business Partners must conduct due diligence during the recruitment of new employees, especially during the use of recruitment agencies ensuring that:

- i. All applicants and potential hires must apply for opportunities of their own free will
- ii. The applicants and potential hires are not victims of human trafficking or slavery

EDMI, its subsidiaries and Business Partners must also ensure that employee's employment terms are in compliance with local legislation.

## **4.2. PROCUREMENT & SUPPLY CHAIN MANAGEMENT**

EDMI, its subsidiaries and Business Partners must conduct assessment on new suppliers ensuring that:

- i. Suppliers do not commit any forms of Slavery within their operations and supply chain
- ii. Supplier's health and safety standards are in accordance with local legislation

EDMI require all suppliers to declare/sign off during on-boarding on our Business Partner Code of Conduct (*please refer to Annex C*) which attest that they do not commit any forms of Slavery as well as the Compliance Questionnaire (*please refer to Annex D*) which consist of several questions with regards to Modern Slavery.

Due diligence will be conducted on existing suppliers at regular intervals. If the supplier's performance is not in line with EDM I requirements, improvement will be required and suppliers that still fail to meet EDM I requirements will be terminated.

Risk assessments of the suppliers as well as EDM I's supply chain as a whole will be determined based on the responses received from our Compliance Questionnaire.

Other factors such as the supplier's country of operations, business services rendered will also be taken into account in the risk assessment.

Internal Audits will be conducted periodically on our business operations/suppliers in which priority will be given to the operations/suppliers that are identified to be of higher risk.

## **5. TRAINING & AWARENESS**

EDMI and its Business Partners are expected to provide training on Modern Slavery to their employees to ensure that they are fully aware of:

- i. Our commitment in the fight against modern slavery;

- ii. How employees should report suspicions of modern slavery (i.e. Whistleblowing channel);
- iii. Forms of modern slavery *(please refer to Annex A)*.
- iv. List of some potential red flags of modern slavery *(please refer to Annex B)*;

Training is to be conducted for all new employees and a refresher is to be held annually for existing employees who have completed the training previously.

## 6. RAISE CONCERNS AND SEEK GUIDANCE

All EDMI Employees must adhere to the Prevention of Modern Slavery policy and are responsible to raise concerns of any possible violation or, when in doubt of this Policy, to their Head of Department or Risk & Compliance Department.

Business Partners are required to attest in our Business Partner Code of Conduct declaration that if they learn of or suspect a possible violation of Modern Slavery in connection with their work for EDMI, EDMI's Risk & Compliance Department is to be advised immediately.

If deemed necessary, Employees/Business Partners may escalate concern(s) of possible violation via EDMI Whistleblowing channel.

Whistleblowing channel as follows: -

<u>Email to:</u> whistleblowing@osakiunited.com	<u>Mail to:</u> Osaki United International Pte Ltd 47 Yishun Industrial Park A Level 4 Singapore 768724.
--	---

In the instance that Modern Slavery is suspected or detected, EDMI will evaluate the situation on a case-by-case basis and work together with the Business Partners involved to:

- i. Verify if Modern Slavery is indeed occurring
- ii. Help resolve the Modern Slavery occurring (Law enforcement to be involved if necessary)
- iii. Identify the cause and address gaps in processes and procedures that allowed/led to Modern Slavery occurring

## 7. REVIEW OF POLICY

This Policy must be reviewed by Risk and Compliance Department annually to ensure its continued relevance and effectiveness for EDMI's business requirements.

## **ANNEX A: FORMS OF MODERN SLAVERY**

The following is a non-exhaustive list of forms of modern slavery:

- i. **Human Trafficking:** The recruitment, harboring and movement of a person for exploitation through modern slavery.
- ii. **Slavery:** The offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labor in an unrestricted way
- iii. **Servitude:** The victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
- iv. **Forced Labor:** The victim is either not free to stop working or not free to leave their place of work.
- v. **Forced Marriage:** Coercion, threats or deception are used to make a victim marry, or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
- vi. **Debt Bondage:** The victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
- vii. **Child Labor:** Children are exploited through slavery or similar practices, including for sexual exploitation, engaged in hazardous work which may harm their health, safety or morals, used to produce or traffic drugs. In UK, youngest age a child can work part-time is 13 and Children can only start full-time work once they've reached 18.
- viii. **Deceptive Recruiting for Labor & Services:** The victim is deceived about whether they will be exploited through a type of modern slavery.
- ix. **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual or marriage purposes
- x. **Organ Harvesting:** An individual's organs are surgically removed for sale on the black market

## **ANNEX B: EXAMPLES OF RED FLAGS**

The following is a non-exhaustive list of red flags as indication of any potential signs of modern slavery risks:

- i. **Restriction of Freedom:** If workers are confined only in the factory premises or do not have the freedom to leave their dormitory or working location. This is a red flag of modern slavery.
- ii. **Poor Working Condition:** Workers must be provided with a safe, clean and well-maintained environment. Workers should not work excessive long hours and should be given reasonable break hours.
- iii. **Lack of Personal Belonging:** Victims of modern slavery will normally possess very few personal items. Passport and personal identification card will probably be confiscated by their employer. Another possible indication is they are dressed in the same set of clothing most days.
- iv. **Unusual Behavior:** Victim of modern slavery usually show signs of distress, often avoiding eye contact, constantly appeared frighten and avoid talking about their working situation.
- v. **Financial Control:** Victims of modern slavery are usually bonded by debts with high interest that often lead to very low salary or sometimes no salary to pay off the debts.
- vi. **Sign of Physical Abuse:** Alarm must be raised when workers are identified to be physically unhealthy, dirty and unfit to perform their duties. Reg flags should be raised immediately when there is scarring, bruises or other injuries.

## **ANNEX C: EDM I BUSINESS PARTNER'S CODE OF CONDUCT**

[EDMI Business Partner Code of Conduct \(Page 1 of 2\) \(office.com\)](#)

## **ANNEX D: EDM I COMPLIANCE QUESTIONNAIRE**

[EDMI Compliance Questionnaire \(Page 1 of 4\) \(office.com\)](#)