



ORBNET
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MODERN SLAVERY POLICY

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We are committed to sourcing quality products from, and building relationships with, suppliers who share our values and ethical standards. We do not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

We are an equal-opportunities employer committed to creating and ensuring a non-discriminatory and respectful working environment for our colleagues. Our recruitment and people management processes are designed to ensure that all prospective colleagues are legally entitled to work in the UK and to safeguard colleagues from any abuse or coercion once in our employment.

We want all our colleagues to feel confident that they can expose wrongdoing without fear of retaliation.

Our Whistleblowing Policy encourages all colleagues to raise concerns including potential violations of the Code of Conduct, company policies, and the laws of the countries in which we operate. We have reporting mechanisms in place to collect and relay information regarding potential violations to appropriate company resources for review and follow up action.

Within the last 12 months, we have updated our Whistleblowing Policy and refreshed our internal communications on this topic.

SUPPLY CHAIN AND DUE DILIGENCE

Our principal suppliers are regulated manufacturers and distributors of IT products in the surveillance industry.

Some of our suppliers are in countries that may be more vulnerable to human rights abuses than others. That is why we have several methods to manage our zero-tolerance policy for such abuses, including the following:

- We clearly communicate our expectations to suppliers to ensure adherence to our values and ethical standards.
- We establish appropriate policies and processes within our businesses to make sure that the products we purchase and sell comply with our ethical standards.
- We utilise both internal and external resources to evaluate the factories of our suppliers based in higher risk countries and audit them against recognised industry standards.

For our responsible sourcing and quality management systems, we have designed and implemented a number of processes to assess suppliers of the products introduced into



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the supply chain. The focus areas included in the assessment process include, but are not limited to, Commercial, Compliance and Quality Assurance.

Adverse audit findings, non-conformities and other remediation requirements are prioritised based on risk. If remediation is required, we work with our suppliers to improve their standards with corrective action plans and on-going reviews to make sure our standards are maintained. We aim to build relationships with our suppliers to ensure adherence to our values and ethical standards. If a supplier fails to adequately remediate the issue, the relationship would be risk assessed and if necessary treated and terminated.

EFFECTIVENESS

We will be reviewing our supplier monitoring program to ensure our actions are appropriate and we believe our efforts to date have been effective in preventing slavery and human trafficking from being part of our supply chain.

We will consider further enhancements to help ensure a robust, proportionate and risk-based approach including refining our approach to ongoing and repeat due diligence on a risk-basis for all suppliers.

STATEMENT OF APPROVAL

This Statement has been approved by the Directors of ORBNET Systems Edward Cutts & Eric Bourque

This policy is work in progress and will be reviewed annually.

Signed:

Edward Cutts Director, Sales & Tech Ops

Eric Bourque Director

Date: December 2021