

OROTON MODERN SLAVERY Policy

Oroton is committed to conducting its business with the highest standards of integrity and will only work with suppliers who share and follow our high standards of ethical business behavior and who demonstrate commitment to those standards.

We are also committed to eliminating any form of Modern Slavery including Forced, Compulsory or Bonded labour from our entire supply chain. The purpose of this Modern Slavery Policy is to ensure the expectations required of Vendors and Sub-Contractors in relation to our Ethical Sourcing Policy and Supplier Code of Conduct are understood and to define the actions that will result from any identified occurrence of any form of Modern Slavery within our entire supply chain.

Modern Slavery is defined as any exploitative practice such as human trafficking, any slavery like practice or any form of forced or bonded labour. Forced, Compulsory or Bonded labour is defined as:

- Forced and Compulsory Labour is defined as any work or service for which that person has not offered them self voluntarily;
- Bonded labour occurs when people give themselves into slavery as security against a loan or when they inherit a debt from a relative.

This Policy applies to all vendors, factories or authorised sub-contractors (“suppliers”) in all Regions involved in the manufacturing of Oroton proprietary branded and licensed merchandise sold by Oroton or any authorised seller.

Suppliers shall not use any type of forced labour which includes any work or service performed involuntarily under threat of physical or other penalty, such as prison, indentured or bonded labour.

All types of Indentured, bonded and prison labour are strictly prohibited as is requiring a worker to complete a task for which the worker has refused to perform if they believe the task to be hazardous or harmful to them or other workers.

To support our Vendors, Factories and Sub-Contractors, we commit to the elimination of all forms of Modern Slavery from our end to end supply chain including to:

- Develop and communicate our modern slavery policy to all relevant stakeholders;
- Adhere to all local and international laws and rules in all Countries of manufacture;
- Complete a Modern Slavery Risk Assessment identifying where the risk of modern slavery, forced, compulsory or bonded labour is most prevalent in our supply chain;
- Focus our attention on the regions where the risk of modern slavery is most prevalent for Oroton;
- Train our team members on our expectations of modern slavery including how to identify;
- Work with our supply chain partners to ensure our expectations of modern slavery are clearly understood;
- When identified, ensure a thorough investigation is conducted by an independent person.

In addition, Vendors, Factories and Sub-Contractors who wish to supply products to Oroton shall adhere to the expectations of this Modern Slavery Policy, our Ethical Sourcing Policy and Supplier Code of Conduct which includes ensuring workers have:

- Freedom of movement
 - Not restricting a worker’s movement at any time (including during and after work hours);
 - Not to confiscate workers’ identity documents for any reason (copies may be held by the factory for Human Resources purposes);

- Not to hold money deposits for any reason;
- Allowing workers to end their employment by giving a reasonable period and not taking any action to prevent workers from terminating their employment;
- Not charging workers any fees for termination of employment;
- Implement a functioning confidential grievance mechanism in the factory for workers to raise issues;
- Freedom of association
 - Allowing workers the right to join a union, workers representative group of their choice or collectively bargain without fear of harassment, interference or retaliation;
 - Where unions or collective bargaining is prohibited by law, allow workers the right to form or join a Workers Representative Group;
 - Provide written employment contracts (in local language) to all workers stating the full terms and conditions of their employment (including wages to be paid);
- Wage Payments
 - Not with-holding a worker's wage or salary for any reason
 - Not to deduct any unfair or excessive monthly fees from workers' wages for any reason;
 - Not with-holding a worker's year-end bonus
 - Provide all workers with an itemised pay slip for all work performed;
- To pay wages fully on time according to the frequency as determined by local or national labour laws (i.e., monthly where wages are paid monthly);
- Working Hours
 - All overtime worked shall be voluntary and workers will not be forced or coerced into working overtime hours;
 - Workers shall not be penalized for refusing to work overtime;

Where an occurrence of any type of Modern Slavery or Forced, Compulsory or Bonded Labour is identified, the following measures must be implemented by the Vendor:

- Immediately advise Orotan of the breach;
- Engage with a civil society organisation to assist with a process to move the affected worker/s to a different factory of the workers decision (if required);
- Remove the worker/s from factory or location;
- Ensure workers are not penalised in any way such as any loss of income during any investigation that occurs.

The Supplier and Orotan will:

- Enable discussions with different Suppliers in the same location about employing the affected worker/s;
- Introduce the affected worker/s to the factory (the worker shall be required to undertake an interview with the new Vendor or Factory);
- If the worker is happy, the worker begins employment at the new factory.

The worker must remain in control of their decision to move to a new factory if they choose. Forcing a worker to move to a new factory removes the decision from the worker which can be deemed to be a form of forced labour.

Orotan will monitor compliance to this Policy and our Ethical Sourcing Policy and we or our representatives, may visit a supplier's factories to audit compliance of any part of this Policy to ensure our business expectations are being upheld. These visits may occur at any time and be announced or unannounced.

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Oroton always expects suppliers to co-operate, to be honest and transparent in their dealings with Oroton and commit to making continuous improvements in their operations. Any breaches of this Policy or our Ethical Sourcing Policy will be reported to the supplier for follow up and corrective action. Where there are breaches and/or the supplier does not demonstrate a willingness to comply, Oroton reserves the right to discontinue business with the supplier.

This Oroton Policy and Ethical Sourcing Code does not replace the local laws of the countries in which our suppliers operate. At a minimum, suppliers should always be familiar with and comply with all relevant laws and regulations. In the event of a conflict between these standards and a local law, the stricter requirement must be followed.

The complete Oroton Ethical Sourcing Policy and Supplier Code of Conduct, can be obtained by visiting www.orotongroup.com

This Policy should be applied with all Oroton Policies and social compliance expectations and operates within the legal and regulatory requirements of the Country in which Oroton, our Suppliers and Sub-Contractors operate.