



Modern Slavery and Human Trafficking Policy

Purpose:

Modern slavery as per the UK Government's website is defined as "the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the [Modern Slavery Act 2015](#) and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after." This policy lays out Oscar Research Ltd's approach to the prevention of slavery and human trafficking in its business and supply chains.

Scope:

This policy applies to all persons working for or on Oscar's behalf in any capacity, including employees at all levels, directors, senior management, contractors, external consultants and any third-party representatives and business partners.

This policy does not form part of any employee's contract and we may amend at any time without notice.

Forms of Modern Slavery in the UK:

- **Labour Exploitation** – forced to work directly for offenders' in businesses and sites that they own or control. The main method of exploitation is not to paying or illegally underpaying the victims.
- **Domestic Servitude** – forced to undertake household chores and childcare for partners/partner relatives/others and confined to the house.
- **Sexual Exploitation** – forced sex work or working in the commercial sex industry (pornography, lap dancing, telephone lines etc.); those manipulated or coerced into sexual activities of any kind for another person's gain.
- **Criminal Exploitation** – victims are manipulated or coerced or trafficked for the purposes of any illegal activities i.e. Drug trafficking; cuckooing (taking over a person's property); forced street crime (shoplifting, begging etc.) cannabis cultivation and sham marriages.
- **Cultural Exploitation** - those manipulated or coerced using religious, social or cultural beliefs e.g. female genital mutilation (FGM), radicalisation, forced marriage.



Definitions:

Slavery is where ownership is exercised over a person whereby the offender acts as if they own the person and deprive them of any freedom or human rights.

Human trafficking is the arranging or facilitating of travel of another human with the view to exploit them.

Servitude/forced labour involves coercion, this may be by threats of violence or more subtle forms of compulsion. Work or service is extracted from a person under the menace of a penalty and for which they have not offered this service or work voluntarily.

Responsibilities:

Modern Slavery is a crime and violation of a person's fundamental human rights. It comes in various forms from slavery, force/compulsory labour, human trafficking and exploitation. Whilst Oscar is not legal obligated to produce an annual modern slavery policy, it has a zero tolerance approach to modern slavery and we are committed to acting ethically and morally in all aspects of our business internally and externally.

We are intent on being transparent in our approach to modern slavery by implementing systems and controls in order to prevent and ensure modern slavery is not taking place within our own company as well as any of our supply chains. We expect our business partners, contractors and suppliers to have the same approach within their own businesses too.

Whilst recognising our obligations to set out the steps we are taking to ensure modern slavery and human trafficking is not taking place in our own business as well as those in our supply chain, we acknowledge that we do not control the conduct of other businesses or the individuals who represent them.

We are implementing the following with immediate effect:

1. Ensuring our Modern Slavery and Human Trafficking policy is available for all to study.
2. Engaging with suppliers to convey to them our policy and to seek clarity on their own approach to Modern Slavery.
3. Introduce contractual provisions for our suppliers and business partners to confirm their adherence to our policy.



Oscar Research will consider the impact of any persons working for or on behalf of the company, who believe they are a victim of slavery, human trafficking or forced labour, and will aim to support and assist the person in reporting this to the appropriate authorities.

Our HR Director has primary and daily responsibility for implementing this policy and for monitoring its effectiveness, as well as ensuring all staff, contractors and person's representing the company are fulfilling their duties in reporting any concerns to line managers, or directors.

Management are responsible for ensuring anyone reporting to them understands and complies with this policy. Managers are also responsible for supporting and assisting in the ease of reporting cases to the appropriate authorities.

You must read and ensure you understand and comply with this policy. Any comments, suggestions or queries regarding the policy should be addressed to the HR Director.

The detection, prevention and reporting of modern slavery and human trafficking is the responsibility of all those working for us. You are advised to avoid any activity which might lead to or is in breach of this policy.

If you believe or suspect any breach of this policy, you have a duty to report this to your line manager or HR at the earliest possible opportunity. As slavery or human trafficking is a criminal offence you are also encouraged to report this to the police or relevant organisation/charity and will have the full support of the company to do so. You are also encouraged to raise any concerns you have regarding any individual or business within our supply chain, who you believe or suspect are in breach of this policy.

If you are uncertain as to whether a particular act, condition of work or treatment of workers constitutes any of the various forms of modern slavery, raise this with your line manager, HR or contact an organisation or charity such as UnseenUK or Antislavery.org.

We aim to encourage openness and will support and investigate any reports made whether in person or anonymously. Individuals are encouraged to put their names forward on any allegations as anonymity does render investigations and validation more difficult and can make the process less effective.

Any employee who breaches this policy will face disciplinary action.

Our zero-tolerance approach to modern slavery and human trafficking must be communicated to our suppliers, contractors and business partners at the outset of our relationships and we may terminate our relationship with individuals or organisations working on our behalf if they breach this policy.