

Human Rights and Modern Slavery Policy

Version 1.0 | Approved 31 July 2026 | Next review 31 July 2027 | Company No. 08522715 | Cyber Essentials certified

This policy sets out Ore Technologies Ltd's commitment to respecting human rights across our own operations and our supply chain, and the process by which we identify, prevent, mitigate and remedy adverse human rights impacts. It is our public policy statement on human rights for the purposes of supplier assessments and due diligence enquiries.

It sits alongside, and does not replace, our annual Modern Slavery Statement published at oretechnologies.co.uk/modern-slavery. The two documents do different jobs. The Modern Slavery Statement is our yearly account of the steps we have taken, in the form set out in section 54 of the Modern Slavery Act 2015. This policy is our standing commitment and the process behind it, covering the full range of human rights rather than modern slavery alone.

1. Scope and proportionality

This policy applies to Ore Technologies Ltd, to everyone working for or on behalf of the company including directors, employees, associates and contractors, and to our supply chain, including our named delivery partner Dotsquares Ltd.

Ore Technologies is a small United Kingdom professional services business. Section 54 of the Modern Slavery Act 2015 requires a slavery and human trafficking statement only from commercial organisations with a total annual turnover of £36 million or more, and we fall below that threshold. We nonetheless maintain this policy voluntarily and apply the principles of the United Nations Guiding Principles on Business and Human Rights proportionately to our size, sector and the nature of our operations.

Proportionate does not mean minimal. It means our controls are sized to the risk we actually carry. As a remote-first ICT advisory and delivery business with no manufacturing, no physical products and no raw material sourcing, our inherent human rights risk in our own operations is low. Our principal exposure sits in our supply chain, specifically in sub-contracted software delivery labour, and our controls are concentrated there.

2. Our commitment

Ore Technologies supports and respects the protection of internationally proclaimed human rights. We commit to the following international standards and frameworks:

- The Universal Declaration of Human Rights
- The United Nations International Covenants on Human Rights, being the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights
- The core labour standards of the International Labour Organization
- The OECD Guidelines for Multinational Enterprises
- The United Nations Guiding Principles on Business and Human Rights

We also commit to the environmental prohibitions relevant to human rights due diligence, including the Stockholm Convention on Persistent Organic Pollutants, the Minamata Convention

on Mercury and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes. We do not manufacture products or handle hazardous substances, and we will not knowingly engage a supplier that breaches these conventions.

3. What this policy covers

We do not tolerate, and we take steps within our influence to prevent, the following in our operations and supply chain:

- Child labour, and any practice that fails to protect children
- Forced labour, modern slavery, servitude and human trafficking in all forms
- Unsafe or unhealthy working conditions, and any failure of occupational health and safety
- Denial of freedom of association or of the right to collective bargaining
- Discrimination and harassment of any kind, and any failure to promote diversity and inclusion
- Payment below an appropriate living wage, or below the applicable statutory minimum in the relevant jurisdiction
- Excessive or unlawful working hours
- Harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption that impairs a person's health, access to food, water or sanitation
- Unlawful eviction, and unlawful deprivation of land, forests or waters
- The unlawful use of private or public security forces
- Retaliation against anyone who raises a concern in good faith

We give particular attention to groups and populations that may require it, including women, children, indigenous peoples, minorities, persons with disabilities, and migrant workers and their families.

4. Governance and responsibility

The Chief Executive of Ore Technologies holds board-level accountability for human rights and is the responsible owner of this policy. In a company of our size this is the appropriate level: the accountable person is a director of the company and is directly involved in supplier selection, contracting and delivery oversight.

Day to day responsibility for applying this policy sits with the director or senior manager responsible for the relevant engagement and for supplier onboarding.

This policy is approved by the board and reviewed at least annually.

5. Risk analysis

We carry out a documented human rights risk analysis at least once a year, and additionally whenever we take on a new supplier or enter a materially different market or sector.

What the analysis covers

- Our own operations, including recruitment, employment terms, pay, working conditions and equality of treatment
- Our direct suppliers and sub-contractors, with particular focus on those providing labour
- Where information is reasonably available to us, risks beyond our direct suppliers

How we do it

- Supplier self-declaration and contractual assurances collected at onboarding and on renewal
- Assessment of country and sector risk using publicly available indices and guidance from the International Labour Organization, the United Nations and comparable sources
- Review of the nature of the work, the workforce delivering it, and the conditions under which it is delivered
- Information received through our grievance mechanism and through delivery governance meetings

How we prioritise

We prioritise identified risks by severity, being the scale, scope and irremediable character of the potential harm, by likelihood, and by our ability to influence the outcome. Where a risk is assessed as high, we seek further information directly from the supplier concerned and, where appropriate, request evidence or a corrective action plan.

We record the analysis, the risks identified, the priority assigned and the measures agreed.

6. Preventive measures

In our own operations

- All directly employed staff are engaged on a properly operated PAYE payroll and paid at least the statutory National Living Wage or National Minimum Wage, with rates checked at every annual uplift. In practice our roles are remunerated substantially above the statutory minimum, reflecting the specialist nature of the work.
- Right to work checks are carried out for every engagement.
- Our Diversity, Equity and Inclusion Policy, Health and Safety Policy and Terms of Business set out the standards we apply to treatment, safety and conduct.
- Everyone working for or on behalf of Ore Technologies receives a briefing on this policy, on how to recognise the indicators of forced labour and human trafficking, and on how to raise a concern.

In our supply chain

- Human rights and labour standards form part of supplier selection and onboarding. We ask suppliers to confirm their approach and their ability to evidence it.
- Where we make a commitment in a bid or a contract, we include a corresponding requirement in the relevant sub-contract so that the obligation flows down to the party actually performing the work. We already operate this mechanism for confidentiality, security and skills commitments, and we apply it to human rights on the same back-to-back basis.
- We expect our suppliers to pay their staff at least the applicable statutory minimum wage in their jurisdiction, to comply with local working time law, and to uphold the standards set out in section 3 of this policy.
- We monitor supplier performance through our normal delivery governance and review meetings, and request supporting evidence where appropriate.
- Ore Technologies remains the accountable party to our clients for the conduct of any supplier delivering work on our behalf.

Fair pay

Ore Technologies Ltd is a National Living Wage and National Minimum Wage compliant employer. All directly employed staff are paid at least the statutory rates set by the UK Government, and we apply the revised rates promptly following each annual uplift in April. In practice, as a professional ICT consultancy, our roles including consultants, architects and directors are remunerated significantly above the statutory minimum, reflecting the skilled and specialist nature of the work.

We maintain this compliance through a properly operated PAYE payroll. Pay levels are checked against the current Government National Living Wage and National Minimum Wage rates at each review and at every statutory uplift, and appropriate payroll records are retained. No directly employed worker is paid below the applicable legal minimum.

We value the principle of the Real Living Wage as set by the Living Wage Foundation. We are a small organisation and are not formally accredited, and we do not claim to be. Our pay practices meet and exceed the statutory minimum, and we are committed to maintaining fair and sustainable pay as we grow.

We extend this commitment through our supply chain. We expect our suppliers, including our named delivery partners, to pay their staff at least the applicable statutory minimum wage in their jurisdiction. Fair pay and labour standards form part of our supplier selection and onboarding.

Last reviewed: 31 July 2026. Next review: 31 July 2027.

7. Grievance mechanism

Anyone may raise a human rights concern relating to Ore Technologies or our supply chain, whether or not they work for us. This includes our own people, associates, the employees of our suppliers and sub-contractors, our clients, and any third party or community affected by our activities.

How to raise a concern

Email: info@oretechnologies.co.uk

By post: Ore Technologies Ltd, 7 Bell Yard, London, WC2A 2JR, United Kingdom, marked for the attention of the Chief Executive.

How the mechanism works

- Concerns may be raised anonymously. We will still investigate.
- There is no cost to raising a concern and no requirement to use a particular format or language. Where a concern is raised in a language we do not read, we will arrange translation.
- We acknowledge receipt within five working days where contact details are provided.
- The Chief Executive, or a director not connected to the matter, reviews and investigates the concern.
- We report the outcome to the person who raised the concern where they can be contacted.
- We do not tolerate retaliation of any kind against anyone who raises a concern in good faith, and retaliation is itself a disciplinary and contractual matter.
- The mechanism, its accessibility and its effectiveness are reviewed at least annually.

8. Remediation

Where we identify that we have caused or contributed to an adverse human rights impact, we will provide for or cooperate in its remediation through legitimate processes. Where an impact is directly linked to our operations, products or services through a business relationship, we will use our leverage to seek to prevent or mitigate it.

Where a supplier is unwilling or unable to correct a serious breach within an agreed timescale, we will terminate the relationship. Termination is a last resort, because it can remove the leverage we would otherwise use to improve conditions for the people affected.

9. Monitoring effectiveness

We review the effectiveness of the measures set out in this policy at least annually, and on an ad hoc basis where a concern is raised or a material change occurs in our operations or supply chain.

The review considers whether risks were correctly identified, whether measures were implemented, whether they achieved their intended effect, what the grievance mechanism surfaced, and what should change. Where the review identifies a shortcoming, we update the measures and the policy accordingly.

10. Reporting and records

We publish an annual statement on the implementation of our human rights due diligence on our website at oretechnologies.co.uk. The statement covers our risk analysis procedure, the human rights aspects identified, any actual effects, the measures taken, and the responsibilities defined within the company.

We retain documentation of our risk analysis, preventive and remedial measures, and any complaints received, for a minimum of seven years.

11. Related policies

This policy should be read alongside our annual Modern Slavery Statement, our Modern Slavery and Human Trafficking Policy, our Supplier Code of Conduct, our Worker Welfare and Fair Labour Standards Policy, our Anti-Bribery and Ethical Procurement Policy, our Recruitment and Vetting Policy, our Whistleblowing Policy, our Diversity, Equity and Inclusion Policy, our Health and Safety Policy, our Sustainability and Environmental Responsibility Policy, our Carbon Reduction Plan, our Prompt Payment and Supply Chain Payment Policy, our Skills and Skills-Development Commitment, our Supply-Chain Skills and Apprenticeships Process, and our Terms of Business.

Approval and review

David Alafifuni

Approved by: David Alafifuni, Chief Executive, on behalf of the board of Ore Technologies Ltd

Date of approval: 31 July 2026 | Next review due: 31 July 2027

Published at: oretechnologies.co.uk/human-rights

