

## **Introduction**

This statement is the Modern Slavery Statement (the “Statement”) of Ox Mountain Limited (OXMT). This Statement has been produced in accordance with Australia’s Modern Slavery Act (2018) and the United Kingdom’s Modern Slavery Act (2015). This Statement outlines the steps OXMT has taken to identify and develop a strategy designed to better manage its exposure and ensure continuous improvement of the risks of modern slavery to its supply chain and business operations. OXMT does not own or control any other entities.

OXMT requires ethical and transparent work practices and, consistent with these principles, takes a zero-tolerance approach to any form of modern slavery.

This Statement has been reviewed by the Board and a copy of the Statement is accessible to both the public and all consultants, officers, directors and employees of OXMT via the Company’s website (<https://www.oxmt.net/our-approach>), via the Australian Border Force’s website (<https://modernslaveryregister.gov.au/statements/>) and via the UK’s Modern Slavery Statement registry (<https://modern-slavery-statement-registry.service.gov.uk/>).

## **About OXMT**

OXMT was founded in March 2015 and our mission is to automate maintenance processes. Our principal activities consist of designing, developing and licensing software that helps industrial companies to optimize maintenance processes, reduce maintenance costs and standardize their use of master data.

Our registered office is in London, UK, and we have two branch offices in Australia. As of March 31, 2024, we had a total of 23 employees.

## **OXMT Business and Modern Slavery Risks**

OXMT recognise that modern slavery is a significant worldwide problem. OXMT is committed to ethical and law-abiding workplace practices and business dealings, both internally and with our supplier, vendors and partners. Valid authorization to work is required for all new hires onboarding in UK and Australia. To the extent that we should ever become aware of fabricated, fraudulent, or falsified work authorization documentation we would take appropriate measures up to and including notifying proper authorities.

Our Staff Handbook which all employees must read and acknowledge, requires ethical business practices and compliance with applicable laws. Employees are also provided guidance for escalating grievances and complaints through appropriate channels without fear of retaliation.

OXMT will not retaliate against any employee who reports activities believed to be illegal, dishonest, unethical or otherwise improper. Any employee who is concerned about any improper behaviour is directed to report such activity to their line manager, or the Chief Executive, or a Board director. Further guidance is available here:

(a) UK office: <https://www.gov.uk/whistleblowing>

(b) Australia office: <https://asic.gov.au/about-asic/contact-us/complaints-about-companies-organisations-or-people/whistleblower-protections/>

When engaging with suppliers and vendors, OXMT seeks to work with ethical and law-abiding companies and, to this end, OXMT where practicable requests contractual commitments from our suppliers and vendors to comply with all applicable laws, including any and all applicable anti-forced labor, anti-slavery, anti-discrimination and anti-harassment laws.

Based on our business model and geographical footprint, OXMT believes that our risk to modern slavery is limited, because OXMT does not have intricate supply chains, multiple contractor or subcontractor levels, or vendor relationships with large manufacturing businesses where modern slavery has been found to be an issue. In addition, the systems and methods that we use to contract with suppliers are managed centrally.

However, OXMT recognizes that all businesses have a risk of modern slavery – even if that risk lies in non-strategic sourcing categories or further down the supply chain. Of interest to OXMT are categories such as hardware suppliers (computers and network equipment), software (cloud based support services), coffee and cleaning. For many of these categories, the risk lies further down the supply chain, so we are committed to working with our suppliers to improve compliance and transparency related to modern slavery.

### **Commitment to Ongoing Assessment**

OXMT monitor the effectiveness of our processes to address modern slavery risks that our business may be linked to. This is continuously reviewed as part of our internal governance structure at OXMT. Based on the results of these reviews, OXMT will adapt and continuously improve our approach to modern slavery.

### **Approval**

This Statement was approved by our Board of Directors and signed on its behalf by Sam Michael.

SM digital signature 14/05/2024

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Sam Michael  
Exec Chair