

## **Introduction**

This statement is Ox Mountain Limited's Modern Slavery Statement (the "Statement"). 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 Ox Mountain 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.

Ox Mountain requires ethical and transparent labour 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 the Company 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 Ox Mountain Limited**

Ox Mountain Limited 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 Oxford, UK, and we have two branch offices in Australia. As of March 31, 2021, we had a total of 17 employees.

## **Ox Mountain's Business and Modern Slavery Risks**

Ox Mountain recognises that modern slavery is a significant worldwide problem. Ox Mountain 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/asic-investigationsand-enforcement/whistleblowing/>

When engaging with suppliers and vendors, Ox Mountain seeks to work with ethical and law-abiding companies and, to this end, Ox Mountain 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, Ox Mountain believes that our risk to modern slavery is limited, because Ox Mountain 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, Ox Mountain 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 Ox Mountain 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 Monitoring**

Ox Mountain recognizes the need to continue to build its understanding, oversight and management of modern slavery risks in our operations and supply chains.

Ox Mountain will review and update our policies, practices and procedures, as required, to maintain appropriate safeguards against any mistreatment or persons involved in our business.

### **Approval**

This Statement was approved by our Board of Directors and signed on its behalf by Laurie Kennedy.

*LK - digital signature 28/11/2021*

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Laurie Kennedy  
Chairman