

1. Purpose

OPHARDT Hygiene has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015 and EU Directive 2011/36/EU.

2. Definition

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

3. Key Principles

At OPHARDT Hygiene, we are committed to:

- **Zero Tolerance:** Any form of modern slavery is strictly prohibited.
- **Ethical Recruitment:** No coercion, deception, or worker-paid recruitment fees.
- **Worker Rights:** All employees are free to leave employment and retain control of their identity documents.
- **Transparency:** We are committed to openness in our operations and supply chain practices.

OPHARDT Hygiene is dedicated to respecting the dignity, rights, and contributions of all workers. We reject exploitation, discrimination, and unlawful practices. By adhering to this policy, we uphold our responsibility to create a workplace that is just, inclusive, and compliant with international standards.

4. Supplier Risk Management

In line with international reporting templates, we:

- **Supplier Compliance:** Suppliers must comply with our ethical standards as outlined in our Supplier Code of Conduct.
- **Map Risks:** We are committed to mapping and assessing supply chain risks.

5. Training

Training on this policy, and the possible risks our business faces from modern slavery in its supply chains will be communicated to all individuals who work for us, and updates will be provided using established methods of communication.

4. Reporting & Accountability

To ensure this policies efficiency we:

- **Encourage Openness:** We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. We encourage individuals to report any suspected violations of our Code to compliance@ophardt.com.
- **Take Action:** Where risks or violations are identified, we will act swiftly. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

4. Monitoring & Review

This policy does not form part of any employee's contract of employment and we may amend it at any time. This policy will be reviewed annually to ensure alignment with evolving regulations.

7. Approval

This policy is approved by the CEO on behalf of the Directors of OPHARDT Hygiene and is effective as of March 25, 2026.



Ken Friesen

CEO

On behalf of the Directors of OPHARDT Hygiene

March 24, 2026