



Open Capital affirms its commitment to combating trafficking in persons

1. Opposition to Human Trafficking and Forced Labour. Opposition to Human Trafficking and Forced Labour. The Company is opposed to human trafficking and forced labour in any form and is committed to maintaining business practice standards that honour and protect the dignity and integrity of everyone with whom the company conducts business, employs, and serves. No person employed by the Company shall engage in any form of trafficking in persons or modern slavery, as defined below, and the Company's employees, our contractors and subcontractors at any tier, and our employees, labour recruiters, brokers or other agents are aware of the trafficking-related prohibitions included in the Trafficking in Persons clause located in U.S. Federal Acquisition Regulation (FAR) 52.222-50.

Trafficking in persons includes the following:

- Procurement of a commercial sex act;
- Use of slavery, servitude and forced or compulsory labour
- Securing services by force, threats or deception; or
- Acts that directly support or advance trafficking in persons, including the following acts:
 - Destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents;
 - Failing to provide return transportation or pay for return transportation costs to an employee from a country outside of the country from which the employee was recruited upon the end of employment if requested by the employee, unless exempted from the requirement to provide or pay for such return transportation by USAID or its prime contractor; or if the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action;
 - Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretences, representations, or promises regarding that employment;
 - Charging employees recruitment fees; or
 - If OCA has offered to provide housing, providing housing that fails to meet host-country housing and safety standards.

As the Company is a management consulting and financial advisory firm, the risk of the company or any members of its supply chain engaging in modern slavery is expected to be low. To mitigate any potential risk, the Company has put in place the following policies, guidance, and due diligence processes. Pursuant to section 54(1) of the UK's Modern Slavery Act 2015, annually the policies related to and steps taken to mitigate Human Trafficking and Forced Labour are reviewed and all Company employees are trained.

2. Consequences of Policy Violation and Reporting Process. Any violation of the forced labour and combating trafficking in humans is policy by an employee of the Company could result in disciplinary action up to and including termination. The Company will take any and all appropriate actions, up to and



including immediate termination of a contract with any subcontractor, vendor, or grantee that fails to comply with this policy. All employees are required to report any possible non-compliance with this policy immediately to their supervisor and/or management, without fear of retaliation. In addition, employees may report suspected violations to the 24-hour Global Human Trafficking Hotline by phone at +1-844-888-FREE or by email at help@befree.org.

If the Company is made aware of any credible information from any source pertaining to a suspected trafficking violation, the Company will investigate such allegations, take appropriate remedial measures, and immediately notify its prime contractor and USAID or FCDO (as relevant). The Company will fully cooperate with the relevant government agencies including USAID Office of Inspector General and U.S. Federal agencies responsible for audits, investigations, or corrective actions related to trafficking in persons, as necessary.

3. Recruitment and Wage Plan with Respect to This Policy. The Company only permits the use of recruitment companies that can demonstrate their employees are professionally trained and requires recruiters to comply with local labour laws and to provide potential employees and agents with accurate information pertaining to their employment. The Company prohibits charging employees for recruitment fees.
4. Housing Plan with Respect to This Policy. If the Company offers housing to its employees, such housing must meet host-country legal requirements.
5. Further Prevention Procedures. . Further Prevention Procedures. If the Company is in a position to subcontract or subgrant any USAID or FCDO-related contract, applicable Code of Conduct, FAR and Mandatory Standard Provisions are “flowed down” to all Company subcontractors and grantees. All subcontractors and grantees that are required to develop a compliance plan in accordance with the regulations must certify to the Company on an annual basis that they have implemented a compliance plan and that they, to the best of their knowledge, are not engaged in activities defined as trafficking in persons.

Staff involved in FCDO funded business, can immediately report all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance to the FCDO Counter Fraud and Whistleblowing Unit (CFWU) at reportingconcerns@FCDO.gov.uk or on +44(0)1355 843747