

POLICY NAME	SECTION	APPROVED	ORIGINAL	REVISED	PAGE
Modern Slavery		Management	11/05/24		

OnPoint is committed to upholding the highest ethical standards in all aspects of its business operations and supply chains. We do not use, are not complicit in, and do not tolerate any form of modern slavery, including human trafficking, forced labor, bonded labor, descent-based slavery, and child labor. We regularly evaluate our operations and supply chains to identify and address modern slavery risks. This policy aligns with guidance from the International Labour Organization (ILO), OECD Guidelines, the Ethical Trading Initiative Base Code, the UN Guiding Principles on Business and Human Rights, and the UN Global Compact.

1. Commitment to Preventing Modern Slavery

- **Zero Tolerance for Modern Slavery:** OnPoint maintains a zero-tolerance policy toward any form of modern slavery. We are committed to ensuring that our business operations and any associated supply chains remain free from exploitation.

2. Controls to Detect and Prevent Modern Slavery

- **Risk Assessments:** OnPoint conducts risk assessments to identify and address potential risks of modern slavery in its operations and supply chains.
- **Supplier and Subcontractor Vetting:** We require that suppliers and subcontractors undergo evaluations, including certifications or audits where appropriate, to ensure compliance with our anti-slavery standards.
- **Objective Setting:** OnPoint has established objectives to monitor and measure our progress in preventing modern slavery and adapts these controls as needed.

3. Training and Awareness

- **Employee Training:** OnPoint provides training to all employees on modern slavery and the controls we have in place to prevent its occurrence. This training is periodically assessed for effectiveness, and retraining is conducted as needed.
- **Management Education:** Managers receive enhanced training to help them recognize potential signs of modern slavery and understand their role in upholding our commitment to preventing exploitation.

4. Safe Reporting Mechanism

- **Reporting Concerns:** OnPoint has established a reporting process that allows employees to report any concerns related to modern slavery without fear of retribution. This confidential process is designed to encourage openness and protect whistleblowers from retaliation. All reports are handled confidentially, and no employee will face retaliation for raising concerns.

5. Supply Chain Communication and Enforcement

- **Expectations for Suppliers and Subcontractors:** OnPoint communicates its anti-slavery expectations throughout its supply chain and expects all suppliers and subcontractors to align with these standards. Suppliers who fail to meet these expectations are subject to review and potential termination of business relationships.

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6. Program Review and Continuous Improvement

- **Ongoing Program Review:** OnPoint regularly reviews its modern slavery program to ensure that controls are effective and align with current industry standards and regulatory requirements.
- **Performance Monitoring:** We periodically audit our practices and may develop key performance indicators to assess and improve our efforts over time, ensuring that our controls remain relevant to our operations and the broader supply chain context.