

Modern Slavery Act 2015 Compliance Policy Statement

March 20, 2024

To Whom It May Concern:

OvationData, Ltd. is committed to upholding the principles and objectives outlined in the Modern Slavery Act 2015. We recognize the gravity of modern slavery and human trafficking, and we are dedicated to ensuring that our operations and supply chains are free from any form of exploitation or forced labor.

Our Commitment:

- **1. Zero Tolerance:** Ovation maintains a zero-tolerance policy towards modern slavery, human trafficking, forced labor, and any other forms of exploitation within our organization and supply chains.
- 2. Supply Chain Due Diligence: We are committed to conducting due diligence on our suppliers to assess and mitigate the risk of modern slavery and human trafficking within our supply chains. This includes evaluating our suppliers' policies, procedures, and practices related to labor rights and ethical employment practices.
- 3. Supplier Engagement: Ovation engages with our suppliers to raise awareness of modern slavery and encourage compliance with the Modern Slavery Act 2015. We work collaboratively with our suppliers to address any identified risks and implement appropriate remediation measures.
- **4. Employee Training and Awareness:** We provide training and awareness programs to our employees to ensure they understand the risks of modern slavery and human trafficking and their role in identifying and reporting any concerns.
- **5. Reporting Mechanisms:** Ovation maintains robust reporting mechanisms for employees and stakeholders to report any suspicions or concerns related to modern slavery and human trafficking. Reports are treated with confidentiality, and appropriate actions are taken in response.
- **6. Continuous Improvement:** We are committed to continuously reviewing and improving our policies, procedures, and practices to prevent and address modern slavery and human trafficking effectively.
- 7. Transparency and Accountability: Ovation will transparently report on our efforts to combat modern slavery and human trafficking in our annual statements, as required by the Modern Slavery Act 2015. We hold ourselves accountable for our actions and strive for transparency in our operations.

Ovation believes that eradicating modern slavery and human trafficking is a collective responsibility, and we are dedicated to playing our part in achieving this goal. Through our actions, partnerships, and ongoing commitment, we aim to contribute to a world where all individuals are treated with dignity, respect, and fairness.

This policy statement has been approved by Gregory Servos, Executive Chairman on 20 March 2024.

Gregory Servos

Executive Chairman

Ovation Data

Georgy Steves