

Dated June 2017

O.C. TANNER LIMITED
MODERN SLAVERY ACT 2015
TRANSPARENCY STATEMENT

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O.C. TANNER LIMITED

Registered Office: 6a Imprimo Park, Lenthall Road, Loughton, Essex, IG10 3UF

Co. Number: 04176737

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our modern slavery transparency statement for the financial year 2016/2017

Introduction from the Board Directors

Since its inception, O.C. Tanner has prided itself on building a culture that facilitates and promotes ethical business practices and appreciation of the work force. It's at the heart of everything we do.

O.C. Tanner develops strategic employee recognition and reward solutions that help people accomplish and appreciate great work. Our core values are to serve our clients in ways that grow their people, their brands, and their bottom lines by aligning multiple programs into strategic global appreciation solutions tailored to their individual cultures. It is imperative to us that this concept filters through every element of our business – from the services we provide, to our own workforce, and throughout our supply chain.

We are proud of the steps we have taken to combat slavery and human trafficking but this is an issue we take seriously. We appreciate that this is an ongoing responsibility and are committed to continue to improve our practices to combat slavery and human trafficking.

Our Organisation's Structure

We are a part of the O.C Tanner Group (the **Group**), and our ultimate parent company is O.C. Tanner Company which has its head office in Salt Lake City, Utah. Globally, we have over 1600 employees from 59 countries of national origin. We operate in 150 countries throughout the world and have global headquarters in Utah USA, Ontario Canada, Essex England, Mumbai India, Sydney Australia and Singapore.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery stance reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We have zero tolerance to slavery and human trafficking. If a partner or supplier does not meet our standards, or has been found to have been involved in modern slavery, we will terminate our relationship with them.

Due to our Group's global nature, we also operate in accordance with the California Transparency in Supply Chains Act of 2010. Similarly to the UK's Modern Slavery Act 2015, this requires us and our supply chain to refrain from the direct or indirect use of forced labour or any forms of human trafficking. We ensure that all suppliers agree to operate in compliance with this act.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we regularly review and monitor our business practices and those of our suppliers.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Fully protect whistle blowers.

Our Supply Chains

We partner with many different companies throughout the world. Likewise with our suppliers, we expect the organisations we work with to behave ethically and to maintain fundamental labour and human rights standards. We won't only choose a partner or supplier on the basis of costs; relationships are only fostered with like-minded companies.

When we work with partners and suppliers, we ensure that they commit to the same high quality standards that we have by agreeing to meet the following quality initiatives:

- A potential supplier must submit an evaluation survey before a relationship is established with O.C. Tanner. The survey includes questions about the suppliers' environmental and social initiatives and their quality standards.
- Once a partnership is established, we conduct annual reviews on the top 80% spend of our suppliers with the O.C. Tanner Supplier scorecard. If a supplier fails to meet standards, we work with them to clearly define a corrective action plan to meet expectations before we terminate the relationship.

Compliance Monitoring

Our board of directors ensure our company's compliance with our Anti-Slavery Policy, and if necessary, will investigate and manage any risk of modern slavery within our business and/or supply chain. Our Head of Purchasing in the UK evaluates all UK vendor selection and will escalate any concerns to the board.

Training

We have worked hard to raise awareness of modern slavery and collaborate with our partners and suppliers to ensure our standards are being met, and to find alternative solutions.

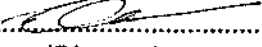
We acknowledge that in order to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we must provide training to our staff and encourage those with whom we partner to do the same.

Further Steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- We will continue to review our partner and supplier relationships to ensure that they behave ethically and maintain our fundamental labour and human rights standards.
- We will continue to review and update our supplier evaluation survey in order to ensure that that we gain an understanding of any risks associated with a new supply chain. A new questionnaire is currently being produced and will be in use shortly.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2017.

Signed.....
(Director)

For and on behalf of O.C. Tanner Limited

Date: 20th June 2017