



MODERN DAY SLAVERY STATEMENT

Modern Day Slavery and Human Trafficking Statement

At October, we are fully committed to ensuring that modern slavery, human trafficking, forced labor, and any forms of exploitation are not present within our business or supply chains. This commitment is intrinsic to our core values and the ethical principles that underpin our operations.

Our Business and Supply Chain Structure

October operates within the mental health and HR consulting industries. Our supply chain is tightly controlled as we are a software services provider, and fully employ all our development, sales and operations staff. We utilize 3rd party providers for hosting digital group sessions, who are trained mental health professionals.

Policies in Relation to Modern Slavery and Human Trafficking

We have implemented various policies and practices to ensure compliance with our commitment to eliminate modern slavery:

1. **Code of Conduct:** Our Code of Conduct clearly outlines the expectations we have of our employees and business partners concerning ethical behavior and compliance.
2. **Supplier Code of Conduct:** Our suppliers are expected to adhere to our Supplier Code of Conduct, which explicitly prohibits the use of forced labor and any form of exploitation.
3. **Regular Audits:** We regularly audit our suppliers to ensure compliance with our ethical standards and promptly address any violations.



Risk Assessment and Due Diligence

October acknowledges that certain industries and geographic areas are at higher risk of modern slavery. Therefore, we have implemented a comprehensive risk assessment process to identify and mitigate these risks. Our due diligence includes a thorough review of suppliers, especially those in high-risk sectors or regions.

Training and Awareness

We invest in educating our staff and partners about the risks of modern slavery and human trafficking. Regular training sessions ensure that our team is well-equipped to identify warning signs and take appropriate action if they suspect any violations.

Our Commitment

We recognize the importance of continuous improvement and annually review our policies and strategies to combat modern slavery. We encourage transparency and open dialogue with our stakeholders, including our customers, suppliers, and the general public, to uphold our commitment.

October is resolutely opposed to modern slavery in all its forms and will continually strive to ensure it has no place in our business or supply chains.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes October's modern slavery and human trafficking statement for the financial year ending 2023.



Signed,

A handwritten signature in black ink, appearing to be "AL" or similar initials.

Alon Lits (Feb 15, 2024 17:07 GMT+2)

Alon Lits
Director
October Health Limited

Modern Day Slavery Statement

Final Audit Report

2024-02-15

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