Ethical Sourcing Policy – Optima Investments and Subsidiary Companies

ETHICAL SOURCING POLICY PURPOSE

Optima Investments Group Limited and its subsidiary companies are committed to conducting business ethically, responsibly, and in a manner that respects human rights, worker wellbeing, health and safety, and fair employment practices.

This Ethical Sourcing Policy sets out the minimum standards and expectations that Optima Investments Group requires of suppliers, subcontractors, labour providers, service partners, manufacturers, and other third parties engaged to provide goods or services to our businesses.

Our objective is to develop long-term relationships with suppliers and partners that align with our values and demonstrate a genuine commitment to ethical labour practices, worker wellbeing, lawful employment, and responsible business conduct.

Optima Investments Group recognises that employment conditions, labour rights, and human rights expectations continue to evolve globally. Accordingly, this policy will be regularly reviewed and updated to reflect changing legal, ethical, and operational expectations.

SCOPE

This policy applies to all suppliers, subcontractors, labour providers, service partners, manufacturers, consultants, and other third parties providing goods or services to:

- Optima Investments Group Limited
- SiteCare Limited
- Evotek Technologies Limited
- Visual Networks Limited
- Monitor NZ Limited

Where suppliers engage subcontractors or labour providers to deliver services on their behalf, Optima expects reasonable steps to be taken to ensure these parties also comply with the principles outlined in this policy.

OUR COMMITMENT

Optima Investments Group expects all suppliers and service partners to uphold ethical and humane working conditions and to comply with all applicable employment, labour, human rights, health and safety, and environmental laws in the jurisdictions in which they operate.

We are committed to working collaboratively with suppliers to encourage continuous improvement in ethical workplace standards and labour practices.

Where suppliers may not yet fully meet the expectations of this policy but demonstrate a genuine commitment to improvement, Optima Investments Group may work with them to implement corrective actions within agreed timeframes.

Where a supplier is unwilling or unable to address serious or repeated non-conformance, Optima Investments Group reserves the right to suspend or terminate the business relationship.

ETHICAL SOURCING EXPECTATIONS

FORCED LABOUR AND MODERN SLAVERY

Optima Investments Group has zero tolerance for modern slavery, forced labour, bonded labour, involuntary labour, debt bondage, human trafficking, prison labour, exploitative labour practices, or any form of coercion.

Employment must be freely chosen.

Workers must not be required to:

- surrender passports, identity documents, or immigration papers;
- lodge deposits or financial guarantees as a condition of employment; or
- pay unreasonable recruitment fees.

Workers must be free to leave the workplace at the end of their shift and terminate employment in accordance with lawful notice requirements.

Suppliers must ensure workers have freedom of movement and are not subjected to coercion, threats, intimidation, or unlawful restrictions.

CHILD LABOUR AND YOUNG WORKERS

Child labour must not be used.

Suppliers, subcontractors, labour providers, and service partners must only employ workers who meet the minimum legal working age requirements in the country in which they operate and comply with all applicable child employment laws.

Young workers must not be exposed to hazardous work, excessive working hours, night work, or activities that may negatively impact their health, safety, wellbeing, or education.

Any identified breach of this requirement will be treated seriously and may result in corrective action requirements or termination of the business relationship.

WAGES AND BENEFITS

Workers must be paid fairly and in accordance with applicable employment laws, minimum wage requirements, and relevant industry standards.

Wages and benefits must:

- be paid regularly and on time;
- be clearly documented and transparent;
- comply with applicable legal requirements; and

- include legally required leave entitlements and employment benefits.

Any deductions from wages must be lawful, transparent, and authorised by the worker or otherwise permitted by law.

Workers should be provided with employment terms that clearly explain their role, remuneration, working arrangements, and applicable entitlements.

WORKING HOURS AND WORKER WELLBEING

Working hours, overtime, rest periods, and breaks must comply with applicable local laws and employment agreements.

Working arrangements must not be excessive and should support worker health, safety, and wellbeing.

Suppliers are expected to actively manage fatigue risks, particularly where work involves:

- driving;
- heavy vehicles or mobile plant;
- hazardous environments;
- machinery operation; or
- other safety-critical activities.

Overtime must be lawful, voluntary where required by applicable legislation, and compensated in accordance with legal requirements.

Workers should be provided with reasonable opportunities for rest and recovery to support safe and sustainable working arrangements.

EQUAL TREATMENT AND NON-DISCRIMINATION

Suppliers, subcontractors, labour providers, and service partners must provide a workplace free from unlawful discrimination, harassment, victimisation, and unfair treatment.

Employment-related decisions, including recruitment, remuneration, training, promotion, disciplinary action, termination, and retirement, must not discriminate on the basis of race, ethnicity, nationality, social origin, religion, age, disability, sex, gender identity, marital or family status, sexual orientation, political opinion, union membership, or any other protected characteristic under applicable law.

All workers must be treated fairly, respectfully, and with dignity.

FREEDOM OF ASSOCIATION

Optima Investments Group expects suppliers, subcontractors, labour providers, and service partners to respect workers' rights to freely choose whether to join or not join trade unions, worker representative groups, or other lawful workplace associations, in accordance with applicable local laws.

Workers must be able to raise workplace concerns, communicate with management, and participate in lawful workplace representation without fear of discrimination, intimidation, harassment, or retaliation.

RESPECTFUL TREATMENT AND WORKPLACE CONDUCT

Suppliers, subcontractors, labour providers, and service partners must treat workers with dignity and respect.

Physical abuse, threats of violence, harassment, bullying, coercion, verbal abuse, intimidation, sexual harassment, or any other degrading or inhumane treatment must not be tolerated.

Workers must be able to raise concerns regarding workplace behaviour without fear of retaliation.

HEALTH, SAFETY AND WORKER WELFARE

Suppliers are expected to provide and maintain a safe and healthy working environment and comply with applicable occupational health and safety laws.

Suppliers must:

- identify and manage workplace risks;
- provide workers with appropriate information, instruction, supervision, and training;
- provide suitable personal protective equipment (PPE) where required;
- ensure workers are competent to undertake their duties safely;
- maintain safe plant, tools, systems of work, and equipment; and
- implement reasonable controls to prevent injury, illness, and fatigue.

Workers must have access to:

- clean toilet and sanitation facilities;
- clean drinking water; and
- suitable welfare facilities appropriate to the work being undertaken.

Where accommodation is provided by an employer, it must be safe, hygienic, and fit for purpose.

Optima expects suppliers to assign appropriate responsibility for health and safety management within their organisation.

ENVIRONMENTAL RESPONSIBILITY

Suppliers must comply with all applicable environmental laws and regulations.

Where relevant to the services or products provided, suppliers are expected to:

- manage waste responsibly;
- minimise pollution and environmental harm;
- appropriately manage hazardous substances;
- prevent unlawful discharges to land, stormwater, wastewater systems, or waterways; and
- respond appropriately to environmental incidents.

Optima Investments Group encourages suppliers to continuously improve environmental performance where reasonably practicable.

SUPPLIER COMPLIANCE, MONITORING AND REMEDIATION

All suppliers, subcontractors, labour providers, and service partners are expected to meet the minimum standards outlined in this policy.

Optima Investments Group may undertake supplier assessments, prequalification reviews, site visits, audits, desktop reviews, or requests for supporting information to assess alignment with this policy.

The level of monitoring undertaken will be proportionate to:

- the nature of the supplier relationship;
- operational risk;
- health and safety risk;
- labour risk; and
- the criticality of the services provided.

Where non-conformance is identified, suppliers may be required to implement corrective actions within an agreed timeframe.

Serious, repeated, or intentional breaches of this policy may result in suspension or termination of the business relationship.

REPORTING CONCERNS

Optima Investments Group encourages the reporting of concerns relating to unethical conduct, worker exploitation, unsafe practices, discrimination, harassment, or breaches of this policy.

Concerns may be raised through established reporting channels or directly with Optima Investments Group management.

Reports made in good faith will be treated seriously and handled appropriately.

GOVERNANCE AND REVIEW

This policy is overseen by Optima Investments Group leadership and will be reviewed annually to ensure continued relevance and alignment with legal, ethical, and operational expectations.

Supplier adherence to this policy may be reviewed as part of supplier onboarding, prequalification, contract management, and ongoing supplier performance assessments.

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