

**OCLAS**

OPERATIONAL PERFORMANCE IN ENERGY AND INFRASTRUCTURE

Modern Slavery and Human Trafficking Statement

Voluntary statement for the year ending 31 August 2027

Document reference	OCL-GOV-001
Owner	Sheyi N. Lisk-Carew, Founder and Principal
Effective date	1 September 2026
Review date	1 September 2027

Status: Oclas is not currently a relevant commercial organisation for section 54 of the Modern Slavery Act 2015 because its annual turnover is below £36 million. This is a voluntary statement of commitments and controls, not a claim that the statutory reporting threshold applies.

Organisation and supply chain

Sheyi N. Lisk-Carew, trading as Oclas is a UK-based independent management consultancy. Oclas advises energy and infrastructure organisations on operational performance, operating models, programme delivery and due diligence. The business has no manufacturing operations and maintains a small, professional-services supply chain that may include specialist associates, subcontractors, software providers, travel providers and other business services.

Policy commitment

Oclas has zero tolerance for slavery, servitude, forced or compulsory labour, child labour and human trafficking. No commercial objective justifies conduct that is illegal, coercive, exploitative or inconsistent with fundamental labour rights.

Due diligence and contracting controls

- Use risk-based checks before appointing subcontractors, including identity, competence, ownership, sanctions, adverse-media and conflict-of-interest checks where proportionate.
- Require suppliers and subcontractors to comply with applicable employment, immigration, wage, working-time, health-and-safety, equality and modern-slavery laws.
- Prohibit recruitment fees charged to workers, retention of identity documents, coercion, restriction of movement and unauthorised subcontracting.
- Include audit, information, termination and flow-down rights in higher-risk or material work packages.
- Escalate concerns immediately, preserve relevant evidence and pause or terminate work where a credible risk cannot be resolved.

Risk assessment

The current direct risk is assessed as low because Oclas primarily buys professional services in the UK. Risk increases where services involve labour-intensive supply chains, overseas recruitment, temporary labour, accommodation, transport, facilities, construction, manufacturing or jurisdictions with weaker enforcement. These factors are considered before appointment and during delivery.

Effectiveness, indicators and training

- All new material subcontractors receive proportionate pre-engagement screening and written terms.
- Modern-slavery concerns, corrective actions and terminations are logged and reviewed at least annually.
- Oclas will provide role-appropriate awareness briefings before anyone undertakes procurement or subcontractor-management duties.
- Performance will be reviewed against screening completion, unresolved concerns, corrective-action closure and training completion, rather than unsupported numerical claims.

Speaking up

Concerns may be raised confidentially to onliskcarew@oclasgroup.com. No person acting in good faith will be disadvantaged for reporting a concern. Where required, Oclas will cooperate with law-enforcement, safeguarding and regulatory authorities.

Approval and control

This statement applies to Oclas and to persons engaged to deliver work on its behalf. It will be reviewed annually and whenever the risk profile or legal requirements materially change.

Approved by: Sheyi N. Lisk-Carew, Founder and Principal | **Version:** 1.0

Legal bidder: Sheyi N. Lisk-Carew, trading as Oclas | **Contact:** onliskcarew@oclasgroup.com