

OTTO Engineering, Inc.

Personnel Policy

Subject: Modern Slavery & Human Trafficking Policy

Original: August 9, 2019

The Modern Slavery Act 2015 requires certain entities in the UK carrying on a business or part of a business in the UK, supplying goods or services to disclose information regarding the steps they have taken to eradicate slavery and human trafficking from their supply chain as well as within their own organization.

OTTO is committed to good corporate citizenship and the highest ethical standards. OTTO recognizes its responsibility to address and mitigate the risk of Modern Slavery and Human Trafficking. OTTO does not condone, encourage, support any form of Modern Slavery and Human Trafficking.

OTTO strives to ensure that slavery and human trafficking is not taking place within any of our supply chain business partners and will not tolerate such activities whether within the supply chain or within any part of OTTO Engineering, Inc. OTTO will take steps within our control to immediately remediate this.

OTTO also conducts supplier assessments to determine if our suppliers comply with Modern Slavery and Human Trafficking Laws and to ensure all suppliers confirm they and their supply chain do not engage in Modern Slavery and Human Trafficking.

Awareness training is provided to all new employees during their onboarding process. A review of this policy and its implications are part of OTTO's management review process to ensure that Modern Slavery and Human Trafficking are not present within OTTO.