



## **AABC Modern Day Slavery Policy**

### **INTRODUCTION**

This policy sets out AABC Group's policy on combatting forced labour within our group and in our supply chain. The term forced labour used in this policy includes slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

This policy, together with our Anti-Corruption and Bribery Policy, forms part of our wider commitment to encourage ethical, social and environmental responsibility.

We oppose the use and exploitation of forced labour and we expect all those who work for us or on our behalf to share our zero-tolerance approach. This policy applies to all those who work for us and those who work on our behalf, including employees, agency workers, casual and freelance staff.

### **POLICY STATEMENT**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. We also expect our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors, external consultants, third-party representatives and business partners.

### **RESPONSIBILITY FOR THE POLICY**

1. The AABC Board is responsible for ensuring that this policy complies with our legal and ethical duties.

2. The AABC Board have the day-to-day responsibility for implementing this policy, monitoring it's use and effectiveness, answering queries on it and auditing internal processes aimed at ensuring that forced labour is not taking place within our company or supply chain.
3. The Modern Slavery Act 2015 requires commercial organisations over a certain size to publish a slavery and human trafficking statement each financial year, disclosing the steps an organisation has taken to ensure that slavery and human trafficking is not taking place in its supply chain or its company. AABC does not fall within this category and therefore does not publish an annual slavery and human trafficking statement however we are totally committed to this policy and ensure that we act according to the policy requirements.

### **COMPLIANCE WITH THE POLICY**

1. We are confident that we employ no forced labour directly within our company. However, our aim is to ensure that we review this periodically and to assess the contractors and suppliers within our supply chain for areas of risk and, if a risk is identified, take appropriate steps to address it.
2. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
3. Our employees are expected to be alert to any indicators of forced labour in our company or supplier chain.
4. We do not tolerate any forced labour within our company. If any employee suspects that there has been a breach of this policy or if they have any concerns regarding the issue of forced labour in any part of our company or our supplier chain, they are expected to notify their manager/senior management or report it in accordance with our Whistleblowing policy as soon as possible.
5. We will review this policy to ensure that it is operating effectively. Where concerns have been raised through this policy, we will consider how they have been handled and whether appropriate follow up action has been taken.
6. This policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended by the company at any time.
7. AABC Group condemns slavery, human trafficking and forced labour either within our company itself or within our supply chain as it is an abuse of human rights. We expect individuals and entities within our supply chain (whether direct contractors/ suppliers or those who directly or indirectly supply our direct suppliers) to share the same values.

We are committed to seeking, implementing and maintaining procedures to prevent (where possible) human rights violations from occurring in connection with our business.

We have taken the following steps to assess and manage any risk that our supply chain may use forced labour:

- We have adopted a Modern Slavery and Human Trafficking Policy which rejects the use of forced labour
- We have communicated the policy to our employees and shall continue to increase awareness among our employees of issues related to slavery, human trafficking and forced labour.

We expect our suppliers to:

- undertake to comply with our Supplier Code of Conduct
- warrant that neither their own business nor, to the best of their knowledge, their supply chain uses forced labour
- agree to impose equivalent obligations on their own suppliers

We have prepared this statement for the purposes of the Modern Slavery Act 2015. References in the statement to “forced labour” mean any conduct which is an offence under Part I of that Act including slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

The AABC Modern Day Slavery Policy has been approved & authorised by:

Name: Steve Attwood

Position: Managing Director

Date: 03-08-2017

Signature:

A handwritten signature in black ink, appearing to be 'S. Attwood', written over a horizontal line.