

# Anti-Slavery and Human Trafficking Policy

## 1. Policy Statement

Ardmac will comply with the laws, rules and regulations applicable to our business in all the countries in which we trade. Ardmac have and will continue to adopt a zero tolerance approach to slavery and human trafficking throughout all of its business entities.

The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to tackle slavery and consolidates previous offences relating to trafficking and slavery.

### 1.1 Modern slavery can take different forms as described under the Act,

- a) Slavery, servitude and forced or compulsory labour
- b) Human Trafficking
- c) Meaning of exploitation
- d) Committing offence with intent to commit offence under section 2

### 1.2 This policy applies to all persons:

- a) working for Ardmac, or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, graduates; and
- b) our contractors, external consultants, agencies, third-party representatives, and suppliers.

### 1.3 Ardmac is committed to:

- a) acting ethically and with integrity throughout all of our business dealings;
- b) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or within any of our supply chains; and
- c) ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015.

## 2. Supply Chain

We aim to build close long term relationships with our supply chain enabling the improved performance in safety, quality and value, providing the continuity which is critical in ensuring our continued ability to deliver exceptional performance for our customers.

We will act with integrity and fairness in all our dealings with suppliers. Ardmac are committed to ensuring that no type of slavery or human trafficking exists within any part of our business or in any

of our supply chains throughout the business. To support this we have adopted a vendor approval system.

We expect all members of our supply chain to operate in a way that is deemed best practice in order to tackle modern slavery and human trafficking.

### **3. Policy**

Ardmac are committed to ethical trading and ensuring that the highest standards of integrity are maintained as we conduct our business.

Taking responsibility for the impact of our activities on society and the environment, we have developed and embedded our ethical trading principals into our organisational policies and procedures.

Ardmac's Anti-Slavery and Human Trafficking Policy outlines our commitment to ensuring that through our different systems and controls that modern slavery or human trafficking does not exist in our daily business activities.

### **4. Responsibility for this Policy and compliance**

Everyone within the organisation, at whatever level, has a responsibility for ensuring the implementation of these policies and the upholding of our ethical principals as part of their work.

### **5. Reporting Modern Slavery**

Ardmac Staff and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:

- a) If you are an Ardmac Staff member you must report the incident to your Line Manager; or
- b) If you are a Supplier, you must report the incident to your business contact within Ardmac.

All of our employees and supply chain are made aware of this policy and are informed of their responsibilities in terms of addressing modern slavery. Everybody is encouraged to report any suspect cases in terms of modern slavery or human trafficking. All reported instances will be dealt with in the strictest of confidence.

### **6. Breaches of this Policy**

Any Ardmac staff member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The relevant Ardmac staff member may chose to terminate its relationship with a Supplier if it is in breach of this policy. Alternatively, the relevant staff member may elect to work with the Supplier to resolve such issues.

## **7. Policy Review**

The HR Team in conjunction with Procurement is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice.

This policy does not form part of any contract of employment and may need to be reviewed or amended at any time.

Ardmac Staff members are invited to comment on this policy and suggest ways in which it might be improved by getting in touch with any member of the HR Team.