

Modern Slavery & Human Trafficking Group Policy

APEM Group strictly prohibits the use of modern day slavery and human trafficking within its business and within its supply chains. The Company acknowledges responsibility to the Modern Slavery Act 2015 and governing legislation within the countries within which we operate and we will implement systems and controls aimed at ensuring modern slavery and human trafficking is not taking place within our business or that of our supply chain.

To facilitate our zero tolerance approach to modern slavery within our organisation and supply chain, APEM Group implement due diligence process which includes:

- Evaluating modern slavery and human trafficking risks through our 'Approved supplier process;
Understanding our supply chain so as to identify and assess particular product or geographical risks of modern slavery and human trafficking.
- Understanding imported goods from sources from outside the UK are potentially more at risk for slavery/human trafficking issues;
- Requiring our suppliers to maintain effective systems and controls to ensure modern slavery and breaches to human rights are not connected to their products and services and to report any issues or suspicions.
- As part of our contracting processes, we require suppliers to take all reasonable steps to ensure there is no modern slavery and human rights abuse in any of its operations and supply chains.
- As part of our due diligence consider whether the audit of suppliers is warranted depending on risk status;
- Encouraging the reporting of concerns and the protection of whistle blowers;
- Reserving the right to terminate our relationship with suppliers that fail to improve their performance in line with an action plan or violate our supplier code of conduct.

We operate other policies that assist our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

It is the responsibility of all APEM Group employees to comply with this policy and to report concerns. APEM Group prohibits any form of retaliation for the reporting of such matters.

All staff will be made aware of this statement as part of their induction on appointment and subsequent on-going training. This policy is communicated and published on the company website for all interested parties.

| Version | Active date | Approved by | Comments |
|--|-------------|----------------|----------|
| 1 | 21/06/2023 | APEM Group CEO | |
| <p>This policy is subject to periodic review and change to ensure it remains valid. The review period is annotated within the Version Control section, or the policy may be reviewed prior to this date when prompted by context, such as developments in legislation, industry practice, or the organisation.</p> <p>This Policy has been Equality Impact Assessed and no adverse impact has been identified.</p> | | | |