



MODERN SLAVERY POLICY

A. WHAT IS SLAVERY?

The Modern Slavery Act 2015 covers four activities:

Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.
Servitude	The obligation to provide services is imposed by the use of coercion.
Slavery	Exercising powers of ownership over a person.

B. HOW IS IT RELEVANT TO ANPARIO PLC?

1. Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part.
2. At first glance it may seem that this is not an issue relevant to our business. We are however a global business operating in many countries around the world, sourcing materials from numerous countries. The economic and social conditions in the countries in which we trade are diverse leaving our business and supply chains at risk to the influence of modern slavery.
3. In our business the principal areas of risk we face related to modern slavery are:
 - ✓ our supply chains,
 - ✓ the agencies we use for recruitment, and
 - ✓ the business from whom we source materials.
4. With this in mind, we need to pay close attention to these risk areas and aim to ensure everyone we employ, our agents, sub-contractors, suppliers, distributors and everyone involved in our supply chain are safeguarded, treated fairly and with dignity.
5. Everyone we employ, our agents, sub-contractors, suppliers, distributors and everyone involved in our supply chain must observe this Policy and be aware that turning a blind eye is unacceptable and not an option.

C. OUR COMMITMENT

Within Anpario the commitment to this Policy starts at a corporate level and runs through to all our managers and employees.

1. **At a corporate level we will:**
 - ✓ maintain clear and proportionate policies and procedures to prevent modern slavery in our supply chain;
 - ✓ be clear about our recruitment policy (see 'Recruitment' below);
 - ✓ monitor our supply chains (see 'Supply Chains' below);
 - ✓ lead by example by making appropriate checks on all employees, recruitment agencies and suppliers to ensure we know who is working for us and who we are working with;
 - ✓ ensure we have in place an open and transparent grievance process for all staff;
 - ✓ seek to raise awareness so that our colleagues know what we are doing to promote their welfare; and
 - ✓ make a clear annual statement setting out the steps we have taken to ensure modern slavery is not taking place in our supply chains and to demonstrate that we take our responsibilities seriously.

2. **Our managers will:**

- ✓ listen, and be approachable, to colleagues;
- ✓ respond appropriately if they are told something that might indicate a colleague, or any other person, is in situation where they may be exploited;
- ✓ remain alert to indicators of slavery (see 'Identifying Slavery' below);
- ✓ raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do; and
- ✓ use their experience and professional judgment to gauge situations.

3. **Our employees whatever their role or level of seniority will:**

- ✓ keep their eyes and ears open and if they suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery);
- ✓ follow our reporting procedure if a colleague tells relays something that might indicate they or someone else is being exploited or ill-treated; and
- ✓ tell us if they think there is more we can do to prevent people from being exploited.

D. **OUR PROCEDURES**

1. **Anti-slavery statement:**

We make a clear statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

We make this statement on our website and as part of our company reporting.

2. **Supply chains**

- ✓ We perform thorough due diligence checks and risk assessments on supply chains to ensure the potential for slavery and human trafficking is significantly reduced.
- ✓ Through our Code of Conduct we make it clear to the companies with whom we do business that we are not prepared to accept any form of exploitation.
- ✓ We ensure we can account for each step of our supply processes to ensure we know who is providing goods and services to us.

3. **Human Resources**

- ✓ All our employees are treated equally and paid fairly and restrict working hours to those permitted and that are reasonable.
- ✓ Anpario has an established Equal Opportunities and Dignity at Work Policy which is communicated to all employees and training provided on its implementation.
- ✓ Our HR department follows a firm policy and only uses agreed specified reputable recruitment agencies who have acceptable anti-slavery policies and commitments.
- ✓ To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies and we keep agents on the list under regular review.
- ✓ We always ensure all staff have a written contract of employment and have a full understanding of how they were recruited, and knowledge of any legitimate third party fees paid.
- ✓ We always ensure staff are legally able to work in the UK.

- ✓ We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- ✓ If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures (See 'Reporting Slavery' below).

E. TRAINING AND MONITORING

1. We provide specialist training to those staff members who are involved in managing recruitment and our supply chains with more general awareness training is provided to all staff.
2. We will review our Anti-slavery policy regularly, at least annually and will provide information and/or training on any changes we make.

F. IDENTIFYING SLAVERY

There is no typical victim and some victims do not understand they have been exploited. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

The following key signs could indicate that someone may be a slavery or trafficking victim (this list is not exhaustive):

- ✓ they are not in possession of their own passport, identification or travel documents;
- ✓ they act as though they are being instructed or coached by someone else;
- ✓ they allow others to speak for them when spoken to directly;
- ✓ they are dropped off and collected from work;
- ✓ the person is withdrawn, or they appear frightened;
- ✓ the person does not seem to be able to contact friends or family freely; and
- ✓ the person has limited social interaction or contact with people outside their immediate environment.

A person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

If you have a suspicion, report it.

G. REPORTING SLAVERY

Talking to someone about your concerns may stop someone else from being exploited or abused.

Otherwise, you should discuss your concerns with our HR Manager, Risk and Compliance Officer or a Director who will decide a course of action and provide any further advice.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first before taking any further action.

If you think that someone is in immediate danger, dial 999.

H. Board Approval

This Policy is endorsed by our Board of Directors and will be reviewed regularly.

3 December 2020.
Anpario plc