

# ANTI-SLAVERY AND HUMAN RIGHTS POLICY

## **Policy Statement**

Modern slavery is a crime resulting in an morally abhorrent exploitation of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labor and human rights abuse.

AE Techron is committed to respecting the rights and dignity of all people. AE Techron has a zero tolerance approach to human rights abuses and modern slavery. We are committed to acting ethically and with integrity and transparency in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human rights abuse are not taking place anywhere within either our own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. AE Techron also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

This policy applies to all individuals working for AE Techron or on AE Techron's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

## Responsibility for the policy.

The management has overall responsibility for ensuring that this policy complies with AE Techron's legal and ethical obligations. The General Manager has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in AE Techron's business or supply chains.

#### Compliance

The prevention, detection and reporting of modern slavery in any part of AE Techron's business or supply chains, is the responsibility of all those working for AE Techron or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy. If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or supervisor or report it to Human Resources. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of AE Techron's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline 800 - 0121 - 7000 for further information and guidance on modern slavery. Furthermore, any questionable condition relating to the possible abuse of wages or hourly employees, harassment or sexual abuse, or any activity or condition demeaning to a human being should reported. AE Techron intends to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. AE Techron is committed to ensuring no one suffers any detrimental treatment or victimization as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

## Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct. AE Techron may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery or other human rights abuses.