

Modern Slavery and Human Trafficking Policy

Introduction

Aalberts Surface Technologies Heat Ltd are committed to acting ethically and with integrity in all our business dealings. The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Policy

We are committed to opposing modern slavery in all its forms and we expect the same attitude from all other organisations with which we do business. We realise that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, and workplace abuse.

We will ensure that everyone in our business and our business partners are aware and comply with our Code of Conduct and behavioural standards. We will avoid doing business with those who do not accept our values and standards and who may contravene our policy.

We invest in relationship management throughout the Group in order that we can foster long-term relationships with our customers, suppliers and contractors to understand their business. We review key suppliers to mitigate risks and ensure that they are aware and sign up to the standards and values that we hold.

Relevant policies

The Company operates the following policies that supports its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Speak Up policy (Whistleblowing)** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure "Speak Up" is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form or contact the Aalberts Surface Technologies confidential advisor.
- **Employee code of conduct** The Companies Code of Conduct makes clear to employees the actions and behaviour expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating within the UK and abroad and managing our supply chain.

- **Supplier code of conduct** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct may lead to the termination of the business relationship
- **Recruitment/Agency workers policy** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

The Management team have the responsibility of implementing these policies and standards and will allocate resources (people, training and time) as required. Training is provided within the Company and the wider Aalberts Group.

Andy Borg
Managing Director UK
Aalberts Surface Technologies Heat Ltd

I acknowledge receipt of this statement and declare that our Company have taken steps to ensure that we and our extended supply chain conform to these standards:

Print Name:

Signature:

Position:

Date:

Company: