



Modern Slavery & Human Trafficking Policy

APEM Limited is committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chains, including sub-contractors, and partners. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

As part of the company's due diligence processes into modern slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by the suppliers and subcontractors.

This due diligence includes:

- 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;
- Evaluating modern slavery and human trafficking risks through our 'Approved supplier process';
- Conducting post appointment supplier and subcontractor audits, if appropriate;
- Encouraging the reporting of concerns and the protection of whistle blowers;
- Terminating 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 the following 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, these include: Supply chain, Procurement policy, Ethics policy, Whistleblowing policy, Equal opportunities policy.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015. The implementation and operation of our integrated management system underlines our commitment to this policy. Formal procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

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.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement. The level of management control required for these sources will be continually monitored. The policy shall be available to view on the company website for all interested parties.

Signed

A handwritten signature in black ink, appearing to be 'Adrian Williams', with a horizontal line extending to the right.

Adrian Williams (Managing Director)

Reviewed: 15/04/2020

Revision	Date	Reviewed by	Comments
4	12/04/2019	Adrian Williams	Next Review: 12/04/2020
5	15/04/2020	Adrian Williams	Next Review: April 2021