

## MODERN DAY SLAVERY AND HUMAN TRAFFICKING POLICY

The Modern Slavery Act became an act of parliament on 26th March 2015. The policy sets out to and protect victims of human trafficking and slavery.

A.T.P.B. Ltd wholly supports the Act and is committed to ensuring that our business is conducted in a professional and ethical manner.

A.T.P.B. Ltd will not tolerate the use of forced or child labour in any of its operations.

A.T.P.B. Ltd will not tolerate the physical punishment, abuse or involuntary servitude of any worker.

Our attitude to modern slavery and human trafficking is zero tolerance and we expect all those in our supply chain to demonstrate their commitment and comply with our values. Suppliers Any supplier found to be demonstrate unacceptable practices will be investigated and provided with guidance regarding immediate required improvements. If no improvement is implemented or they indicate an unwillingness to cease unacceptable practices they will be reported to the appropriate authorities and ultimately trading with this supplier would cease.

## **Processes to Oppose Trafficking and Slavery**

We are committed to providing applicable staff with a salary, which at least meets the National Living Wage and offering the required statutory leave entitlement. Furthermore, we ensure all our staff have provided their National Insurance Number, or Working Visa if they are not British nationals, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK. By checking our employees' NI numbers or Working Visa's we know they are legally eligible to work in the UK, and that their salary will be monitored by HMRC.

A.T.P.B. Ltd's supply chain is predominantly UK and EU based therefore expect these entities to have applicable anti-slavery and human trafficking policies and procedures. A.T.P.B. Ltd will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.

## Compliance

The prevention, detection and reporting of modern slavery in any part of A.T.P.B. Ltd's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for A.T.P.B. Ltd or under A.T.P.B. Ltd'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 report it in accordance with A.T.P.B. Ltd's Disclosures in the Public Interest Policy.

Employees encouraged to raise concerns about any issue or suspicion of modern slavery in any part of A.T.P.B. Ltd'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 with any of A.T.P.B. Ltd's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager or a Director. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

A.T.P.B. Ltd aims 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.

A.T.P.B. Ltd is committed to ensuring no one suffers any detrimental treatment or victimisation 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.

A.T.P.B. Ltd's zero tolerance approach to modern slavery is communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

## Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct. A.T.P.B. Ltd may terminate its commercial relationship with suppliers, contractors and other business partners if they are found to have been involved in modern slavery.

A.T.P.B. Ltd will undertake responsibility for implementing this Policy Statement and its objectives.

This Policy Statement will be reviewed and published annually

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