



**API TECHNOLOGIES UK**

**MODERN SLAVERY COMPLIANCE POLICY**

## **Introduction**

API Technologies (UK) Limited (hereinafter API) is opposed to modern slavery and human trafficking in all of its forms.

## **Policy Statement**

This Policy applies to all persons working for API Technologies UK and all subsidiary companies in any capacity, including employees at all levels, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

API are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. We expect that our suppliers will hold their own suppliers to the same high standards.

## **Responsibility for the policy**

The Directors of API have overall responsibility for ensuring this policy complies with our legal and ethical obligations.

Line Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## **Compliance with the Policy**

All employees must read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for API or on behalf of API. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you believe or suspect a breach of this policy has occurred or that it may occur (either within API, or in the supply chain of any supplier) you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

We seek 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. We are committed to

ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains

**Communication and awareness of this policy**

This Policy will be given to each employee annually and on first joining the company, together with the Home Office “Modern Slavery & Victim Identification Guide”.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

**Breaches of this Policy**

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

**Review**

This Policy will be reviewed by the Board of Directors every 3 years and/or if any significant changes in legislation occur.

**Issued  
01 September 2019**