

# AUGHTON AUTOMATION

CONTROL INSTRUMENTATION, ELECTRICAL, MECHANICAL & CIVIL ENGINEERS

## Anti-Slavery and Human Trafficking Policy

Aughton Automation is committed to a work environment that is free from human trafficking, forced and unlawful child labour (collectively “human trafficking and slavery”). Aughton Automation strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Accordingly, Aughton Automation will not knowingly use unlawful child or forced labour in any of the utilities and / or other commodities, products and / or services it provides; nor will it accept commodities, products and / or services from suppliers that employ or utilise child or forced labour.

Ultimate responsibility for the prevention of modern slavery rests with the Aughton Automation leadership.

The Board of Directors has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Our zero-tolerance approach to modern slavery must be communicated to Contractor, Sub-Contractor, Supplier of Goods and or Services and business partners at the outset of our business relationship and reinforced as appropriate thereafter.

### Rationale

Human Trafficking and slavery are crimes under UK and International law. These crimes exist in countries throughout the world. This policy statement thus defines Aughton Automation commitment to ensuring that human trafficking and slavery does not exist within its own business, but also explains how Aughton Automation will make every effort to eradicate “Forced Labour, Forced Labour and Harmful Child Labour from other businesses with whom it shall maintain relationship (and especially from its supply chain).

### Definitions:

#### Human Trafficking:

The recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

#### Forced Labour:

Forced labour refers to work, services or situations not voluntarily performed in which persons are coerced to work through the use of intimidation, threat of force, violence and or penalty, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.

#### Harmful Child Labour:

Consists of employment of children that is economically exploitive, or is likely to be hazardous to, or interfere with, the child’s education, or be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

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## Requirements for Business:

- Aughton Automation will not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily, under threat of penalty.
- Aughton Automation will ensure that the overall terms of employment are voluntarily.
- Aughton Automation will comply with the minimum age requirements prescribed by applicable laws.
- Aughton Automation will compensate workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Aughton Automation will abide by applicable law concerning the maximum hours of daily labour.
- Aughton Automation will not engage in any practice of slavery, servitude, forced labour, compulsory labour and /or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK.
- Aughton Automation will ensure that any sub-contractors or suppliers from which they source goods and / or services for the incorporation in those supplied to Aughton Automation also adhere to these requirements.

## Audit:

Contractor, Sub-Contractor, Supplier of Goods and or Services must be able to certify that materials incorporated into the goods, products, services they provide complies with the laws regarding human trafficking and slavery of the county or countries in which they operate.

Contractor, Sub-Contractor, Supplier of Goods and or Services must also be able to demonstrate compliance with this Policy at the request and full satisfaction of Aughton Automation. Aughton Automation may perform periodic audits on this policy and Contractor, Sub-Contractor, Supplier of Goods and or Services are expected to co-operate with any such audit.

## Reporting:

Any breach of this policy can be reported (in confidence if required) by following our Whistleblowing Procedure.

## Consequences:

Businesses found to have, or be engaging in child labour, human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this policy will be liable to have any agreement, arrangement terminated immediately.

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors at the scheduled Management Meeting and may be amended from time to time.



## Brian Duffy

Managing Director

Aughton Automation

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