



Modern Slavery & Human Trafficking Policy

Introduction

Modern slavery is an undisputable and indefensible violation of an individual's basic human rights. Amberon Ltd recognises that as a commercial organisation we have a moral and social responsibility to take a zero tolerance approach to modern slavery in all forms and apply the highest possible ethical standards. As a company we are committed to preventing slavery and human trafficking in our corporate activities, and to ensuring, as far is reasonably possible, that our supply chains are free from slavery and human trafficking.

Due Diligence

When considering working with and taking on new suppliers, Amberon is committed to undertake due diligence. This due diligence includes:

- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain
- Conducting supplier audits
- Taking steps to improve sub-standard suppliers' practices.

Involuntary Labour, Human Trafficking, and Slavery

- Amberon do not use forced labour - slave, prison, indentured, bonded, or otherwise.
- Amberon do not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction or fraud.
- Working is voluntary and workers are free to leave work and terminate their employment or other work status with reasonable notice.
- We do not require workers to surrender government issued identification, passports, or work permits as a condition of working. We may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing.
- Workers are given clear and understandable contracts regarding the terms and conditions of their engagement in writing.

Associated Policies

Amberon operate the following policies which assist our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Anti-Bribery and Corruption Policy
- Health and Safety Policy
- Corporate Social Responsibility Statement
- Our Supply Chain Code of Practice (AMB0276) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- Amberon have a Public Interest Disclosure ('Whistleblowing') Policy and Procedure in place (AMB0290). The Company constantly strives to safeguard and act in the interest of the public and its employees. It is important to the Company that any fraud, misconduct or wrongdoing, by employees or other agents, is reported and properly addressed.

Training

Amberon require all key employees involved in supply chain management and any other relevant roles, to complete training to ensure employees are able to assess the risk of slavery and human trafficking. Training covers the various aspects of the business, how employees can recognize the signs of slavery and human trafficking and how it should be reported if this type of activity is suspected. In some cases, supplier's employees may also require training.



Approval and Review

The policy will be reviewed annually as part of ongoing training, with input from the Directors and Management of the business.

This statement is made pursuant of section 54(1) of the Act and constitutes our slavery and human trafficking statement.

Signed: Terry Musson

Managing Director

Revision	Date Issued	Approved by	Signature
1	22.02.19	T. Musson	
2	22.02.2020	T. Musson	
3			

Next revision date: 21st February 2021