

1.670	Anti Slavery & Human Trafficking Policy Statement		
Issued by: S.Andrews	Effective Date: 21/01/2021	Rev. F	Pg. 1 of 1
Approved: 21/01/2021 12:47 - Martin Nelson - HSQE			

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy 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.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk –

- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behavior;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

The Commercial and Operations Directors are responsible for compliance in their respective departments and for their supplier relationships.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of House Audits by Department Managers and Project Development Managers;
- Use of payroll systems; and
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.



Martin Shaw
Managing Director - Adien Ltd

Date of Signing
21st January 2021