

## **AET Modern Slavery Policy**

## Purpose

This policy sets out AET's Policy on tackling modern slavery throughout our supply chains and is consistent with AET's disclosure obligations under the UK Modern Slavery Act 2015.

## Scope:

This policy applies to all jurisdictions in which AET operates and covers all individuals working on shore and off shore at all levels and grades on behalf of any company within the AET Group in any capacity whatsoever, including without limitation, the senior management team, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff, and volunteers (collectively referred to as "Employees" throughout this policy).

This policy does not form part of any Employee's contract of employment and AET may amend it at any time.

In the event of a conflict between this policy and local laws, local laws will prevail.

### 1. What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, child labour and human trafficking. All of these crimes have a common feature – they involve one person depriving another person of their liberty in order to exploit them for personal or commercial gain.

While you may think of slavery as a relic of history, unfortunately this is not the case. Today, whilst modern slavery may sometimes still take on the form of bullying and selling people, more commonly victims of modern slavery are controlled through more subtle mechanisms such as wage abuse, compulsory overtime, removal of identity papers or debt bondage.

### 2. What is AET's policy on Modern Slavery?

AET 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 within AET's own business or in any of AET's supply chains.

AET are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015. AET expects the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and AET expects that our suppliers will hold their own suppliers to the same high standards.

AET has implemented the following non-exhaustive guidelines for ensuring our business and our suppliers are free from modern slavery:

- Forced or involuntary Labour  
AET workers will not be subjected to any form of forced, compulsory, bonded, indentured or prison labour. All work must be non-compulsory / non-obligatory and workers shall have the freedom to terminate their employment at any time, provided notice is given.
- Working conditions  
AET shall provide a safe and hygienic working environment for workers. Every effort shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work with AET. Where provided accommodation shall be clean, safe and meet the basic needs of the worker.
- Document Retention  
Confiscating or withholding identity documents or other valuable items, including work permits and travel documentation is strictly prohibited except with the freely given consent of the worker. The retention of personal documents shall not be used as a means to bind workers to employment with AET or to restrict their freedom of movement.

- Contracts of employment  
Where required by law, written contracts of employment shall be provided to workers in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and other working and employment conditions.
- Humane treatment  
AET's workplace shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all workers and shall not include any inhumane disciplinary measures. The use or threat of physical or sexual violence, harassment and intimidation against a worker, his or her family, or close associates, is strictly prohibited.
- Salary and benefits  
All workers shall be paid at least the minimum salary required by applicable laws, and shall be provided with all legally mandated benefits. Salary payments shall be made at regular intervals and directly to workers, in accordance with national law, and shall not be delayed, deferred or withheld.
- Working hours  
Workers shall not be forced to work in excess of the number of hours permitted in national law. All overtime shall be purely voluntary, unless part of a legally recognised collective bargaining or trade union agreement. No worker shall be made to work overtime under the threat of penalty or dismissal. No worker shall be made to work overtime as a disciplinary measure.

### 3. What are your responsibilities?

Employees must ensure that they read, understand and comply with this policy. Employees should strictly adhere to the following policy rules:

- The prevention, detection and reporting of modern slavery in any part of AET's business or supply chains is the responsibility of all those working for AET or under AET's control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- Employees are required to comply with any due diligence, risk assessment and audit requirements set out in AET's standard form documents or procedures relating to the prevention and detection of modern slavery.
- Employees must notify their line manager, the Human Resources Department or the Legal Department as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of AET's business or supply chains at the earliest possible stage.
- If an Employee believes or suspects a breach of this policy has occurred or that it may occur you must report it to their line manager or in accordance with AET's Whistleblowing Policy as soon as possible.
- If an Employee is unsure about whether a particular act, the treatment of workers more generally, or the working conditions within AET's supply chains constitutes any of the various forms of modern slavery, they should raise it with their line manager, the Human Resources Department or the Legal Department.
- AET 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. AET 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 AET's own business or in any of AET's supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If

an Employee believes that they have suffered any such treatment, they should inform the Human Resources Department immediately.

- Employees must ensure that they understand AET's Modern Slavery Policy and are sufficiently informed of AET's modern slavery obligations to be able to explain AET's expectations to third party supplier and, where relevant, monitor compliance.

#### **4. Review of procedures and training**

AET will provide training to all Employees on modern slavery on a regular basis. The level of training an Employee receives will depend on the specific risks associated with their role.

If an Employee considers that they would benefit from refresher training, they should contact the Human Resources Department.

#### **5. Consequences of Non-compliance**

Non-compliance with this Policy could have serious consequences for AET, including criminal penalties, loss of customers and reputation damage.

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

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