

## Slavery and Human Trafficking Policy Statement

### Introduction

AEJ Management Ltd, led by a Board of Directors, works across both the public and private sector, providing individually tailored soft service facilities management solutions nationwide. As a business we are committed to acquiring goods and services for our customers without causing harm to others. In so doing, we are committed to supporting the UK Government's Action Plan to implement the UN Guiding Principles on Business and Human Rights.

This Statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by informing our employees, suppliers, other third-party partners and customers about AEJ Management Ltd and its Statement with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

Although, as a business, we turnover less than the threshold for businesses required to publish a statement under the Act, AEJ Management Ltd Board considers that our customers spend through its supply agreements warrants a statement on the risks inherent in our supply chains and the steps we are taking to address them, in line with our practices in sustainable and responsible procurement.

### Definitions

Our organisation considers that Modern Slavery and Human Trafficking encompasses:

- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Being dehumanised, treated as a commodity, or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

### Our Categories

Our supply chain mainly falls under 4 categories, which are:

- Labour.
- Sub- Contractors / Agency Staff (non-licensed roles).
- Suppliers of equipment and services.
- Supplier of parts.

AEJ Management Ltd is committed to ensuring that:

- Employment is freely chosen;
- Freedom of association and the right to collective bargaining are respected;
- Working conditions are safe and hygienic;
- Child labour shall not be used;
- Living wages are paid;
- Working hours are not excessive;
- No discrimination is practised;

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- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

### Our Plans for The Future

As part of this reporting exercise in this and the coming years, we express our commitment to the abolition of modern slavery, human trafficking, forced and bonded labour and labour rights violations.

This Policy statement has been approved and published by the AEJ Management Ltd Board and will be reviewed at least once annually.

### Responsibility for The Policy Statement

The Board of directors has overall responsibility for ensuring that this policy statement complies with the Company's legal and ethical obligations.

The Managing Director has day-to-day responsibility for implementing this policy statement, monitoring its use and effectiveness, and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy statement.

### Compliance

The prevention, detection, and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under the Company's control. All employees are required to avoid any activity that might lead to a breach of this policy statement.

If any employee believes or suspects a breach of or conflict with this policy statement has occurred or may occur, they must notify their line manager or report it in accordance with the Company's Disclosures in the Public Interest (Whistle Blowing) Policy statement. All employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If an employee is unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, they must raise it with their line manager. Employees can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy statement, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

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### Training and Communication

Regular training on this policy statement, and on the risk that the business faces from modern slavery in its supply chains, will be provided to Managers as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

### Breach of this Policy Statement

Any employee who breaches this statement will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors, and other business partners if they breach this policy statement and/or are found to have been involved in modern slavery.

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