

## Modern Slavery and Illegal Workers Policy

### The Policy

At AJT, we believe our reputation for integrity and ethical behaviour is a critical factor in the success of our business strategy. AJT has a zero-tolerance approach to modern slavery and human trafficking. Our stakeholders – including our people, customers, suppliers, other business partners, shareholders and local communities depend on us to consistently demonstrate integrity, ethical behaviour and good judgement.

Our code of business conduct and ethics reflects our expectations that all our employees, suppliers and business partners to honour these values and our global corporate responsibility relating to modern slavery and human trafficking by:

- ✦ Upholding and respecting human rights everyone in all our operations and facilities
- ✦ Prohibiting the use of child, forced, indentured or involuntary labour in any of our operators
- ✦ Promoting the health and safety of our workers everywhere
- ✦ Ensuring compliance with fair wage and hour laws in all AJT operations
- ✦ Not knowingly conducting business with and terminating any business dealings with any suppliers or business partner who violates these standards.

AJT upholds human rights in all our operations and facilities. We do not condone or permit the use of child, forced, indentured or involuntary labour in any of our operations. We promote the health and safety of our workers everywhere. In addition, we ensure compliance with fair wage and hour laws in all AJT operations. We will not knowingly conduct business with – and will terminate business dealings with – any supplier or other business partner who violates our standards. Also, our commitment to human rights and preventing modern slavery includes encouraging our stakeholders to report any suspected violations or concerns.

### Supply Chain & Due Diligence

Our Ethics and Compliance program requires certain key new suppliers and third-parties to be reviewed and approved prior to engaging them in the provision of goods and / or services. As part of our initiative to identify and mitigate risk, we ask our key suppliers to complete a questionnaire that assess the risk in their business and we continue to roll this out more widely in our supply chain. The supplier questionnaire includes questions on location of sites and training for supplier employees. Our HSEQ teams periodically conduct HSEQ audits on certain key AJT suppliers and are expected to report any concerns regarding modern slavery or other compliance related issues to the Senior Management Team.

Raising Awareness & Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide training for certain staff which includes an assessment. This training is currently being rolled out in the key business areas, particularly Supply Chain and Sales.

Illegal Worker: AJT Engineering Limited carries out appropriate VISA, Passport and DOB checks to ensure all employees are entitled to work in the UK in accordance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006. Should a non-EU resident apply to work with us, as identified by pre-employment screening questions, a copy of their work visa and passport would be required. All necessary checks would then be made to ensure the person had the right to work in the UK and they have no immigration restrictions that prevent them from doing the work in question. Should a potential employees' right to work in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment. All related verified documentation is retained for a minimum of 2 years after the individual has ceased employment with AJT Engineering Limited.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes AJT Engineering's slavery and human trafficking statement for the financial year ending 31st Dec 2023.

David Scalley  
Managing Director

Date: 29/05/2024

Signed:



Next Review: 29/05/2025