

## **PMM Group (PMM)- Anti-Slavery and Human Trafficking Policy**

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Forms of Modern slavery may include, but are not limited to, withholding of passports, being forced to work against a person's will, depending on the employer for housing, food, and other necessities, being recruited through some form of debt arrangement, such as an advance or loan, and limitations on movement of workers.

Although PMM does not meet the legal criteria requiring the Company to publish a Modern Slavery Statement, we fully support the intentions of the Act and strictly prohibit the use of modern slavery and human trafficking in our and our partners operations and supply chain. We expect that our partners and suppliers will hold themselves and their own suppliers to the same high standards.

### **Policy Statement**

We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

We have a zero-tolerance approach to modern slavery in our organisation or our partners or supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

We are committed to engaging with our key suppliers to address the risk of modern slavery in our operations and supply chain. As part of our contracting processes, we include a specific prohibition against the use of modern slavery and trafficked labour.

### **Policy Application**

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.

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

Workers must ensure that they read, understand and comply with this policy.

### **Responsibility for the policy**

The partners have approved this policy and have overall responsibility for ensuring compliance.

Our HR Manager has the day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

### **Reporting Modern Slavery**

Employees must notify their manager or the HR Manager as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy.

If a person, other than an employee, has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify as soon as possible the HR Manager.

We aim 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. We 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook.

### **Breaches of this policy**

Any PMM employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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

This Policy has been adopted by PMM and is regularly reviewed and updated.