



Modern day slavery statement

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Overview

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1. About

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the APN Group’s slavery and human trafficking statement. It sets out our policy and the standard operating procedures by which we undertake business within our Group:

- 1. We are committed to achieving the highest level of ethical standards and implementing sound governance arrangements to ensure integrity and objectivity in our business activity.
- 2. All new agreements with companies that directly provide subcontracted labour to the APN Group are to include an anti-slavery provision. A provision which we are committed to develop and expand through a scheduled process of annual review.
- 3. Our purchase order terms and conditions include an anti-slavery clause, and it is company policy to have a purchase order in place prior to commencing any work
- 4. We are committed to ensuring that there is no modern slavery, child labour or human trafficking in our supply chains or in any part of our business a position which reinforces our commitment to acting ethically and with integrity in all our business relationships.
- 5. We require our own businesses and all our suppliers to adhere to the standards set out by the International Labour Organisation’s Conventions 138 and 182 as regards the employment of children and young people.

2. Code of conduct

We have a Supplier and Contractor Code of Conduct which sets out our specific expectations for all current and prospective suppliers and subcontractors, to reinforce the company’s commitment to be free from force, bonded or compulsory adult or child labour throughout our supply chain.

3. Training

We are in the process of embedding comprehensive modern slavery training for anyone involved in procurement or in the management of contracts that use subcontracted labour. Our own workforce signs a Code of Conduct which requires them to act with integrity in all their dealings with either their colleagues or suppliers. A full explanation of this Code of Conduct is carried out with all new employees.

4. Challenging ourselves

We have mechanisms in place by which we challenge our approach to compliance with the Modern Slavery Act 2015 and to date, this process of review has not highlighted any red flags that indicate modern slavery is present in our workforce or supply chain. Should any future audit activity elicit evidence of non-compliance with the standards we have established, we support our suppliers to achieve improvement and adherence to our required standards; in some cases, we accept that this may not be possible, and our business relationship may need to be brought to an end and the organisation be removed from our approved supplier list.

5. Monitoring and review

We understand that the risk of modern slavery and human trafficking is not static, and we must continue to improve our mitigation in the years ahead to ensure the Group is alert to, and acts upon, emerging industry risks. As part of our continued commitment to improving compliance with the Modern Slavery Act 2015 we will continually monitor and review our policies. We will also continue to monitor our practices, supply chain activities and specifically improve our staff training and awareness programmes via a working group set up explicitly for this purpose.

6. Actions to which we commit in 2024

- Set To further embed our comprehensive Modern Slavery Training for anyone involved in procurement or in the management of contracts that use subcontracted labour.
- To improve supplier engagement and promote the Group's zero tolerance of modern slavery through a supplier communications campaign, so that we can report on, learn from, and bring forward to the board our approach to modern slavery and the requirements we demand of our supply chain.
- To re-energise our internal communications campaigns highlighting awareness of modern slavery across our business through visual reminders, managers briefings and company-wide communications.

- To escalate to board level and act with speed, transparency and integrity to extinguish any identified root cause should we become aware of, or form a reasonable suspicion, that an MSA offence is taking place.

Harry Clarke, Group Chair