

Human Trafficking Policy



Effective Date: April 2024

1. Policy Statement

A&M is committed to maintaining the highest standards of ethical conduct and integrity in its business operations. As part of this commitment, we take a zero-tolerance approach to all forms of human trafficking, modern slavery, and forced labour. This policy outlines our measures to prevent and address any human trafficking risks within our operations and supply chain.

2. Scope

This policy applies to all employees, contractors, suppliers, and any other stakeholders associated with A&M. It covers all business activities conducted by the company, both in the UK and internationally.

3. Definition of Human Trafficking

Human trafficking involves recruiting, transporting, transferring, harbouring, or receiving individuals through coercion, abduction, fraud, or abuse of power for the purpose of exploitation. This includes, but is not limited to:

- Forced labour.
- Debt bondage.
- Involuntary servitude.
- Sexual exploitation.
- Organ trafficking.

4. Compliance with Legal Requirements

A&M complies with all applicable laws and regulations related to human trafficking and modern slavery, including the UK Modern Slavery Act 2015.

5. Our Commitments

- a. Employment Practices
 - i. Ensure all employees are hired freely and are of legal working age.
 - ii. Provide clear contracts of employment that are voluntarily agreed upon.
 - iii. Prohibit any form of forced, bonded, or involuntary labour.
- b. Supplier Code of Conduct.
 - i. All suppliers must adhere to our Supplier Code of Conduct, which includes provisions on:
 - ii. Prohibition of forced or child labour.
 - iii. Respect for workers' rights, including freedom of movement and fair wages.
 - iv. Providing safe and humane working conditions.
- c. Due Diligence
 - i. Conduct regular audits of suppliers and contractors to ensure compliance with anti-human trafficking standards.
 - ii. Assess potential human trafficking risks when onboarding new suppliers.
- d. Reporting and Whistleblowing
 - i. Establish confidential channels for employees and stakeholders to report concerns about human trafficking or modern slavery.
 - ii. Investigate all reports promptly and take appropriate action.

6. Responsibilities

- a. Management
 - i. Ensure this policy is effectively implemented and communicated across all levels of the organisation.
 - ii. Allocate resources for training, auditing, and monitoring related to human trafficking prevention.
- b. Employees
 - i. Comply with the policy and report any suspicious activity or breaches.
 - ii. Participate in training and awareness programs.
 - iii. Suppliers and Contractors
 - iv. Commit to adhering to our Supplier Code of Conduct.
 - v. Cooperate with audits and provide necessary information to verify compliance.

7. Monitoring and Review

A&M will regularly review this policy and its associated procedures to ensure they remain effective and in line with current legal and ethical standards. Reviews will be conducted at least annually or whenever significant changes occur in the business or regulatory landscape.

8. Non-Compliance

Failure to comply with this policy will result in disciplinary action, up to and including termination of contracts with suppliers or dismissal of employees. Serious breaches may also be reported to the relevant authorities.

9. Policy Approval

This policy has been approved by Ben Howell, Commercial and Operations Manager and is effective as of 1 April 2024.

Contact for Concerns:

If you have any questions or wish to report a concern regarding this policy, please contact:

Rebecca Noble, HR Manager

By adhering to this policy, A&M aims to contribute to global efforts to eradicate human trafficking and uphold human rights across our operations and supply chain.