



ASC001 - Anti-Slavery, Human Trafficking & Conflict Minerals

Aim: To ensure AKP Ltd and all employees, suppliers, and any other workers employed by AKP Ltd abide by laws and regulations laid out regarding Anti-Slavery, Human Trafficking, and Conflict Minerals

Responsibility of process: Managing Director

Applicable to: All Staff

Anti-Slavery & Human Trafficking

Introduction

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, suppliers and contractors and any other party that is employed by AKP Ltd.

AKP Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring modern slavery is not taking place within our organisation or in any of our supply chains. We expect our suppliers will hold their own suppliers to the same high standards.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. 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.

Commitments

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

- a) Have a zero-tolerance approach to modern slavery in our organisation and supply chains
- b) 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.
- c) We are committed to engaging with our suppliers to address the risk of modern slavery in our operations and supply chain.

- d) We take a risk based approach to our contracting processes and keep them under review. Our supplier terms and conditions will include prohibitions against modern slavery and human trafficking which will be signed by all companies before commencing work for AKP Ltd. Any companies not agreeing to the terms and conditions will no longer be used by AKP Ltd.
- e) If at any time AKP Ltd undertake a supplier audit, or assessment and find any reason for concern regarding human trafficking or modern slavery, AKP Ltd will cease to work with the company with immediate effect and inform the relevant authorities if necessary. Work with the company in question will halt until such a time as AKP Ltd regains trust with the company, and has no further reason for concern.
- f) If any companies (recruitment or such like) provide workers to AKP Ltd we will ensure that the terms and conditions used by the company include a statement regarding their policies on modern slavery and will only continue with the recruitment if the terms and conditions abide by the terms laid out in this policy.

Conflict Minerals

Introduction

Conflict Minerals are minerals mined in conditions of armed conflict and human rights abuses, and which are sold or traded by armed groups. For some years this has been a particular problem in the Democratic Republic of Congo (DRC)¹.

It is estimated that the DRC contains between 65-80% of the worlds columbite-tantalite (coltan) reserves, 49% of its cobalt reserves and 3% of its copper reserves¹. The main 4 minerals considered as conflict minerals include: - cassiterite, columbite-tantalite, Gold, and Wolframite. Silver can also be considered a conflict mineral in some circumstances.

Commitments

AKP Ltd rarely come into direct contact with the minerals listed as conflict minerals, however from time to time the company may have some involvement in the minerals usage.

Therefore AKP Ltd will commit to:

- a) find new sources for any minerals contained in our products if the minerals are identified as coming from recognised areas of conflict.
- b) Source materials in a responsible and informed manner and mark materials with an individual identity so that full traceability can be provided for all materials.
- c) Suppliers will provide certification for any materials provided to AKP Ltd.
- d) Should suppliers provide AKP Ltd with materials containing conflict minerals, AKP will cease work with the company, until a resolution can be found and AKP Ltd are certain that the matter has been resolved and trust regained.

References

¹Source: www.gov.uk/guidance/conflict-minerals