



# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

## POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking (“modern slavery”), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Lamonde Automation Limited (“Lamonde”, “The Company”, “us”, “we”) has a zero-tolerance approach to modern slavery within its business and supply chains.

This policy applies to all persons:

- (a) working for us, or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns and agents (“our people”); and
- (b) our contractors, external consultants, agencies, third-party representatives, and business partners (“Suppliers”).

We are committed to:

- (a) acting ethically and with integrity in all our business dealings and relationships;
- (b) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and
- (c) ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our Suppliers. As part of our contracting process, we include specific prohibitions against modern slavery, and we expect that our Suppliers will hold their own suppliers to the same high standards.

## IDENTIFYING MODERN SLAVERY

Modern slavery may be found in:

- (a) our business, for example our cleaning and catering workforce;
- (b) our supply chains;
- (c) outsourced activities, particularly to jurisdictions that may not have adequate modern slavery safeguards.

There is no typical victim of modern slavery, and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking:

- (a) The person is not in possession of their own passport, identification or travel documents.
- (b) The person is acting as though they are being instructed or coached by someone else.
- (c) The person allows others to speak for them when spoken to directly.
- (d) The person is dropped off and collected from work.
- (e) The person is withdrawn or appears frightened.
- (f) The person does not seem to be able to contact friends or family freely.
- (g) The person has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.



## RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE

The Managing Director has primary responsibility for

- (a) ensuring this policy complies with the Group's legal and ethical obligations
- (b) implementing this policy and dealing with any queries about it.

All employees and workers must comply with this policy.

All Suppliers must comply with this policy.

## REPORTING MODERN SLAVERY

All Lamonde's people and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:

- (a) If you are a Lamonde employee or worker, the Managing Director or HR department
- (b) If you are a Supplier, your primary account manager or business contact with the Company.

## PUBLICATION OF THIS POLICY

This policy is available to employees and workers. It is referred to within the employee handbook, and training forms part of the Company's induction process.

This policy is available to Suppliers on our website.

## BREACHES OF THIS POLICY

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

If a Supplier is found to be in breach of this policy, Lamonde may work with them to resolve such issues. Alternatively, we may elect to terminate the Supplier relationship with us.

## POLICY REVIEW

The Managing Director, along with Purchasing and Human Resources, is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice.

This policy does not form part of any contract of employment and may be amended at any time.