



PRIME ATLANTIC GROUP MODERN SLAVERY POLICY

Introduction

The Top Management Team at Prime Atlantic Group (PAG) are fully committed to upholding all aspects of the UK Modern Slavery Act 2015 (MSA). PAG will take all steps necessary to ensure that modern slavery, or human trafficking, is not taking place within its business or within its business supply chain in any way, now or in the future. This Policy ensures that PAG complies with s.54 of the MSA 2015 and sets out responsibilities for employers and employees.

Scope

This policy applies to all employees, full and part time, subcontractors, clients, agency workers, suppliers, consultants, and any other interested parties. The policy covers all PAG workplaces and offices.

Definition

The UK's Modern Slavery Act 2015 defines modern slavery as including the offences of slavery, servitude, forced or compulsory labour, and human trafficking. To this could be added forced marriage (which is included in the global estimates of modern slavery produced by the International Labour Organization and the Walk Free Foundation), as well as serfdom, debt bondage, and servile marriage (recognised as practices similar to slavery by the United Nations).

Commitment

PAG is fully committed to:

- Ensuring slavery and human trafficking is considered and addressed in our approach to corporate social responsibility.
- Ensuring that any concerns about slavery or human trafficking can be raised through our whistle blowing procedure.
- Conducting regular audits to confirm all employees are paid at least the national minimum wage and have the right to work in the UK.
- Ensuring all commercial agreements include an obligation on our suppliers to operate in accordance with the MSA 2015, and to ensure that any of their suppliers or subcontractors also operate in compliance of the MSA 2015.
- Appointing the CEO as the individual within the Company to ensure and oversee compliance with the MSA 2015.
- Ensuring PAG identify and address areas of risk within our supply chain.
- Providing training to all employees involved with the supply chain on issues related to slavery and human trafficking.

A handwritten signature in black ink, appearing to read "Ian Russell", is positioned above the printed name and title.

Ian Russell
CEO Prime Atlantic Group