

Modern Slavery Policy

1. Purpose

Prime Atlantic Group (PAG) is fully committed to upholding all aspects of the UK Modern Slavery Act 2015 (MSA). This policy sets out our commitment to ensuring that modern slavery and human trafficking do not take place in any part of our business or supply chain, now or in the future. It also outlines responsibilities for both employers and employees and ensures compliance with Section 54 of the MSA 2015.

2. Scope

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

This policy is implemented in accordance with:

- UK Modern Slavery Act 2015, including Section 54 (Transparency in Supply Chains)
- Relevant international guidance and best practice, including the International Labour Organization and the Walk Free Foundation definitions of modern slavery
- United Nations conventions recognising forced labour, serfdom, debt bondage, forced/servile marriage, and human trafficking

3. Associated Documentation

PAG_SHEQ_PCY_019 Whistleblowing Policy

PAG_SYS_PRO_013 Supply Chain Management Procedure

4. Definitions

Modern slavery includes (but is not limited to):

- a) Slavery
- b) Servitude
- c) Forced or compulsory labour
- d) Human trafficking
- e) Forced or servile marriage
- f) Debt bondage or other practices recognised as similar to slavery

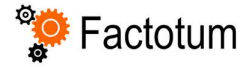
5. Policy Statement

PAG is fully committed to:

- (a) Ensuring slavery and human trafficking is considered and addressed in our approach to corporate social responsibility.
- (b) Ensuring that any concerns about slavery or human trafficking can be raised through our whistle blowing procedure.
- (c) Carrying out regular monitoring to confirm all employees are paid at least the national minimum wage and have the right to work in the UK.
- (d) 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 with the MSA 2015.
- (e) Ensuring PAG identifies and addresses areas of risk within our supply chain.
- (f) Providing training to all employees involved with the supply chain on issues related to slavery and human trafficking.

6. Responsibilities

Directors and Senior Management: Ensure policy implementation and compliance across all operations.



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Line Managers: Promote inclusive behaviours, ensure fair decision-making and address any breaches.

All Staff: Adhere to policy guidelines, report any suspected discrimination, harassment, modern slavery, or human trafficking concerns in line with company procedures.

HR Department: Monitor compliance, advise on implementation and support investigations.

7. Review

This policy will be reviewed annually to ensure its continuing suitability and alignment with the Prime Atlantic Group's strategic direction, Mission, Vision, and Values. If no changes are required during the review, the policy will be confirmed and remain as the current version.