

## **Modern Slavery Policy and Approach to Fair Labour Standards**

**Aban Development Builders** is committed to promoting fair labour standards and eradicating modern slavery in all its forms. We recognize that modern slavery, including forced labour, human trafficking, and child labour, is a global issue that requires collective action. This policy outlines our commitment and approach to prevent, detect, and address any instances of modern slavery within our operations and supply chains.

### **Commitment**

We are dedicated to upholding and promoting fair labour standards and ensuring that all workers are treated with dignity, respect, and fairness. We adhere to all applicable laws and regulations regarding labour practices, including those related to modern slavery, in the countries where we operate. We also expect our suppliers, contractors, and business partners to share our commitment to fair labour standards and actively work to eliminate modern slavery.

### **Risk Assessment**

We conduct regular risk assessments to identify and evaluate the potential risks of modern slavery within our operations and supply chains. This includes assessing geographical locations, industries, and specific stages of the supply chain where the risk of modern slavery may be higher. Based on the results of these assessments, we develop strategies to mitigate and manage those risks effectively.

### **Supplier Engagement and Due Diligence**

We have implemented a comprehensive supplier engagement and due diligence process to ensure that our suppliers and business partners meet our standards for fair labour practices. This includes:

- a. **Supplier Code of Conduct:** We have a clear and robust Supplier Code of Conduct that sets out our expectations regarding fair labour standards. We communicate this code to all our suppliers and require them to acknowledge and comply with its provisions.
- b. **Supplier Assessment:** We assess our suppliers' compliance with our Supplier Code of Conduct through various means, including self-assessment questionnaires, audits, and on-site visits. We prioritize high-risk suppliers and work closely with them to address any identified issues or gaps.
- c. **Supplier Collaboration:** We collaborate with our suppliers to foster transparency and encourage continuous improvement. We provide guidance, training, and capacity-building resources to help our suppliers meet our fair labour standards. We also engage in open and constructive dialogue to address any challenges or concerns.

### **Training and Awareness**

We recognize that raising awareness and providing training to our employees and key stakeholders is crucial in preventing and combating modern slavery. We ensure that our employees, particularly those involved in procurement and supply chain management, receive appropriate training on modern slavery risks, indicators, and reporting mechanisms. We also strive to raise awareness among our stakeholders, including customers, suppliers, and business partners, about our commitment to fair labour standards and the importance of eradicating modern slavery.

### **Reporting Mechanisms and Whistle-blower Protection**

We maintain clear and accessible reporting mechanisms that allow employees, suppliers, and stakeholders to report any concerns or suspicions regarding modern slavery. We treat all reports

seriously and ensure that appropriate actions are taken to investigate and address the reported issues. We are committed to protecting whistleblowers from retaliation and maintaining confidentiality throughout the reporting and investigation process.

### **Continuous Improvement**

We continuously review and improve our policies, procedures, and practices to enhance our approach to fair labour standards and combat modern slavery effectively. We collaborate with industry stakeholders, participate in relevant initiatives, and monitor emerging trends and best practices to stay at the forefront of efforts to eradicate modern slavery.

### **Compliance and Accountability**

We are committed to complying with all relevant laws, regulations, and international standards related to fair labour practices and modern slavery. We regularly monitor and review our performance to ensure adherence to this policy and take appropriate action in cases of non-compliance. Our commitment to fair labour standards is integrated into our corporate governance framework, and senior management is accountable for its implementation and effectiveness.

Signed: *M. Hutchinson*

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