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### Change History

Date	Revision	Modified By	Description of Change(s)
13/09/2023	A		
20/02/2024	A	PHW	Number Change
11/07/2024	B	PHW	Include child labour

### Introductions and Definitions

In this document the following words and phrases have the following meaning:

“The company” covers all entities of the business including API Engineering, PPI Engineering and API Capacitors.

Some parts of the procedure may only be applicable to one company so will have the following designation:

PPI Engineering – P

API Engineering – A

API Capacitors - AC

## 1 Introduction

Collectively we must understand and appreciate the need for good practice when considering the implications and impact child labour & slavery and human trafficking has on everyone - staff, our customers, our families and loved ones and the wider, global public.

This statement sets out the company's actions to understand all potential modern slavery and Child labour risks related to our business and to put in place steps that are aimed at ensuring that there is no child labour nor slavery or human trafficking in our own business and our supply chains.

### 1.1 Organisation's Structure and Business

We are a design, manufacturing and consultancy with our head office based in Norwich, Norfolk, United Kingdom.

## 2 Modern Slavery Act and Child Labour Statement

We recognise that the use of child labour & slavery and human trafficking is a pervasive hidden issue in our society, furthermore we recognise that we have a responsibility to take a robust approach to child labour & slavery and human trafficking. No employee is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work.

### Our policy on slavery and human trafficking.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking. We expect our customers, suppliers (and contractors) with whom we do business to uphold the same standards.

Should a pattern of violation of these principles become known to the company and all subsidiaries we shall discontinue the business relationship

### Our policy on child labour

We will not tolerate the use of child or forced labour in any part of our business or that of our customers and suppliers. We will not tolerate the exploitation of children, their engagement in unacceptably hazardous work, and the physical punishment, abuse, or involuntary servitude of any worker. We expect our customers, suppliers (and contractors) with whom we do business to uphold the same standards. Should a pattern of violation of these principles become known to the company we shall discontinue the business relationship

We require all our customers and suppliers to adhere to the standards set out by the International Labour Organisation as regards the employment of children and young people. In particular:

- (a) children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 15; and
- (b) those under 18 must not be required to perform hazardous duties.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to providing an open inclusive environment where communication and discussion is encouraged to ensure the successful implementation of a safe working environment free from any support or acceptance of child labour, slavery and human trafficking. We are committed to ensuring effective systems and controls to ensure that any form of child labour, slavery or human trafficking is not taking place in our own business or that of customer or our supply chain.

## 2.1 Code of Conduct.

As a manufacturer and service provider, we are committed to ensuring that the company, our suppliers, and customers adhere to the highest standards of ethics.

API Holdings and subsidiary companies retain the right to ensure that Suppliers and Customers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

We will only work with suppliers and customers that ensure that they meet the standards of the code and improve their worker's working conditions. Violations will lead to the termination of the business relationship.

## 2.2 Due Diligence

The company undertakes due diligence when considering taking on new customers and suppliers, and regularly reviews its existing commercial relationships. The company due diligence and reviews may include:

- evaluating the child labour, modern slavery and human trafficking risks of each new customer and supplier;
- review on a regular basis all aspects of our business;
- conducts customer & supplier assessments, which have a greater degree of focus on child labour, slavery and human trafficking where general risks are identified;

The organisation operates the following policies that describe its approach to the identification of child labour, modern slavery risks and steps to be taken to prevent modern slavery and human trafficking in its operations:

### 2.2.1 Whistleblowing Policy

We encourage all our colleagues, customers and other business partners to report any concerns related to the direct activities, or the customers and supply chains of the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Employees, customers or others who have concerns can Contact

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Tel +44 (0)1603 728 680

### 2.2.2 Employee Code of Conduct

The company code makes it clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when acting for the business.

### 2.2.3 Training

To ensure a high level of understanding of the risks of child labour, modern slavery and human trafficking in our supply chains and our business, we intend to provide access to training for our employees.

## 2.3 Further Steps and resources

We are committed to reviewing the effectiveness of our policies and procedures with regard to combatting slavery and human trafficking. We intend to explore how to measure and assess the management of the risks that are identified.

Where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the current financial year.

Legislation <https://www.legislation.gov.uk/ukpga/2015/30/section/54>

Signed

Michael Robinson

Managing Director  
July 2024