

Acteon Group Limited	Process	Issue Date
	General Compliance	19 December 2017
Title: Anti-Slavery Policy	Policy No.	Revision No. 1
	L&C No.2	



Acteon Group Limited

Legal & Compliance

Anti-Slavery Policy

L&C NO.2

REVISION HISTORY

Version	Issue Date	Reason for Issue	Author	Approver
1			RLT	RCH
Draft				

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1.0 Scope and Application

2.0 Definitions

3.0 Exceptions

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1.1 SCOPE AND APPLICATION

The new United Kingdom Modern Slavery Act 2015 (the “**MSA**”) is a key part of the United Kingdom’s effort to combat the global issues of forced labour, domestic servitude and human trafficking. The MSA consolidates and develops existing law of the offences of slavery and trafficking. It is possible for corporate entities to be held criminally liable for those offences and whilst no entity of Acteon Group would knowingly engage in these practices, the requirements of the MSA compel organisations to look beyond their own boundaries to understand their worldwide supply chain. The expectation is that organisations will then, where necessary, exert influence to eradicate any use of slave labour.

Acteon Group Limited (“**AGL**”) has developed its Anti-Slavery Policy to allow its employees to identify and avoid situations where they and AGL could be exposed to situations of forced labour, servitude and human trafficking.

However, this policy also represents good and ethical business practice, because in a free, open and competitive marketplace the quality of AGL’s goods and services will ensure its continued position as an industry leader.

If in doubt concerning any aspect of this policy, or if you become aware of circumstances which may be covered by the MSA, the best course of conduct is always to contact Acteon Legal Counsel (as defined in section 2.0) for assistance as soon as possible, before you act. All suspected violations of the MSA by AGL entities or third parties should be reported to Acteon Legal Counsel, individual Acteon company compliance advocates or the confidential compliance helpline.

1.2 The Policy

AGL is committed to driving out acts of modern day slavery from within its own business and that from within its supply chains. It acknowledges the responsibilities arising from the MSA and will ensure transparency within its organisation and with suppliers of goods and services to the organisation. This is a worldwide commitment involving all of AGL’s businesses.

AGL will not support or deal with any business knowingly involved in slavery, forced labour or human trafficking. This policy reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

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1.3 Global Reach

This policy applies to all employees of AGL, its direct or indirect subsidiaries and affiliates (“**Acteon companies**”) and any joint venture (whether incorporated or not) where AGL or an Acteon company has an interest (“**JV**”), in all countries, whether full or part time, contractors or agents. AGL, the Acteon companies and the JVs are together referred to as “**Acteon Group**”).

1.4 Scope of Policy

AGL’s Policy applies to all activities of employees, while they are representing Acteon Group.

1.5 Adhere to Policy

All employees must understand and comply with the provisions of the policy as they may bear on their activities and decisions. Managers and supervisors must make sure that the policies and procedures are enforced in their areas of authority.

Guidance materials will be circulated at the time this policy is implemented and will be revised from time to time as the need arises.

All employees receive periodic compliance training. They are required to attend such training and may be required to sign regular certifications of compliance.

1.6 Supplier Conduct Audits

Subject to any applicable privacy laws and the contractual arrangements, AGL reserves the right to conduct audits of its suppliers to review and assess their compliance with the MSA and expects all Acteon companies and JVs to incorporate relevant contractual provisions to this effect.

1.7 Do Not Act as Your Own Lawyer—Ask Questions Before You Act

Questions may arise as to the propriety of a certain action or practice. If you have a question about the possible application of this policy or the MSA to any of your activities, consult Acteon Legal Counsel before proceeding.

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1.8 Report Suspected Violations

If you observe or learn of any conduct within AGL that you suspect may violate the MSA you should report your suspicions to Acteon Legal Counsel. You also may report concerns anonymously through AGL's confidential compliance helpline.

No employee may be discharged, demoted, suspended, harassed or in any other manner discriminated against as a result of reporting a potential violation. There will never be any retaliation or adverse action taken against employees on the grounds that they have reported legitimate concerns that AGL's Anti-Slavery Policy may have been violated. On the contrary, a wilful failure to report such concerns may result in disciplinary action.

1.9 Company Penalties.

Penalties for violating AGL's Anti-Slavery Policy may include official reprimand, demotion, reduction in pay and termination of employment.

2.0 Definitions

Acteon company or Acteon companies means any direct or indirect subsidiary, affiliate, participation or joint venture (whether majority controlled by a member of the Acteon Group or not) or partnership.

Acteon Legal Counsel means the Group General Counsel or any other Legal Advisor so nominated by the Group General Counsel.

3.0 Exceptions.

There are no exceptions. AGL management will not tolerate any conduct that is contrary to the policy as set forth herein.

Acteon Group Ltd

15 September 2017