

Anti-Slavery Policy

Professional Advantage (PA) is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

PA is not compelled to by law to report in terms of the Modern Slavery Act 2015 (MSA) but has undertaken to voluntarily abide by this policy.

The policy applies to all persons working for or on behalf of the Company, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

PA expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its values.

The Company will only do business with organisations who fully comply with this policy, or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on slavery and human trafficking that the Company is required to produce further to the transparency in supply chain requirements of Section 54 of the MSA.

What Do We Mean by Modern Slavery?

Modern slavery can take many forms; it is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- **Slavery:** where ownership is exercised over an individual
- **Servitude:** involves the obligation to provide service imposed by coercion
- **Forced and compulsory labour:** all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
- **Human trafficking:** involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the MSA, include, but are not limited to:

- **Child labour:** whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspect of the A-Gas business and business relationships.

- breach of this policy.

Responsibility for This Policy

The Board of Directors has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The Chief Financial Officer will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

Communication and Employee Awareness Training

Line Managers will ensure that relevant colleagues receive adequate training on this policy and any supporting processes applicable to their role.

Breaches of This Policy

The breach of this policy by an employee, director or officer of the Company may lead to disciplinary action being taken in accordance with the Company's Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

All colleagues will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the People and Culture Team.

Status of This Policy

This Anti-Slavery Policy will be reviewed by the Executive Board on a regular basis.

This notice reflects the Company's current practice. PA will update the notice from time to time to reflect legal and operational requirements.