

|                                                           |             |                |
|-----------------------------------------------------------|-------------|----------------|
| <b>FP ADVANCED COATINGS</b><br><b>ANTI-SLAVERY POLICY</b> | Ref:        | <b>APOL001</b> |
|                                                           | Issue Date: | <b>Nov 25</b>  |
|                                                           | Issue:      | <b>02</b>      |

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another, to exploit them for personal or commercial gain.

FP Advanced Coatings (the company) has a zero-tolerance approach to modern slavery, is committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere within our company or within any of our supply chains.

FP Advanced Coatings is also committed to ensuring that there is transparency in our company and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

- This policy applies to all personnel working for us or on our behalf, in any capacity.
- This policy does not form part of any employee's contract of employment and we may amend it at any time.

#### **Responsibility for the policy**

FP Advanced Coatings has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it, and the issue of modern slavery in supply chains.

If you have been issued with a copy of this policy, you are invited to comment on its' contents and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

#### **Compliance with the policy**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager OR a company director as soon as possible, if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

|                                                           |             |                |
|-----------------------------------------------------------|-------------|----------------|
| <b>FP ADVANCED COATINGS</b><br><b>ANTI-SLAVERY POLICY</b> | Ref:        | <b>APOL001</b> |
|                                                           | Issue Date: | <b>Nov 25</b>  |
|                                                           | Issue:      | <b>02</b>      |

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company director.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, the company will provide support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company director.

FP Advanced Coatings aims to encourage openness and the company will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure (details can be found in the current employee handbook - see contract/terms and conditions document).

#### **Communication & awareness of this policy**

Training on this policy, and on the risk FP Advanced Coatings faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you. Our zero-tolerance approach to modern slavery shall be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. The company may terminate its' relationship with other individuals and organisations working on the company's behalf, if they breach this policy.

This policy has been approved by Chris Waterhouse – Director

|                                                                                                      |        |
|------------------------------------------------------------------------------------------------------|--------|
| Signed: C. G. W.  | Dated: |
|------------------------------------------------------------------------------------------------------|--------|