

AWE Management Limited & AWE PLC Modern Slavery & Human Trafficking Statement 2019



This statement is made on behalf of AWE Management Limited and AWE Plc its majority owned operating company. The statement relates to the financial year 2019 and is made pursuant to Section 54(1) of the Modern Slavery Act (MSA) 2015 “Transparency in Supply Chains”.

Policies on slavery and human trafficking

At AWE, we are committed to acting with integrity in everything we do and upholding the highest standards of corporate behaviour. Our policy, “Code of Conduct and Business Ethics”, contains a declaration that we will take the appropriate steps to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains. The policy also sets out our commitment to respecting the human rights of our colleagues and our supply chain. In addition, the revised Code of Ethics contains a section on modern slavery and human trafficking along with a related dilemma for consideration. This Code goes to all employees, new starters and is available on the company’s website.

AWE’s designated Ethics Officer continued to offer an invaluable reporting service to staff throughout 2019. In addition, AWE offers a dedicated confidential telephone line that enables individuals to obtain help and guidance on ethical issues 24 hours a day 7 days a week.

Recruitment processes

AWE continues to conduct stringent pre-employment checks on all new employees. We fully align to the AWE Employee Value Proposition and monitor employee engagement as a measurable indicator of the ethics of our own operation and working environment. AWE’s HR department works closely with the Supply Chain Management team to ensure that AWE does not engage in modern slavery or human trafficking in either its own operations or those of its subcontractors or suppliers. This work continues to be supported by a specialist Contingent Workforce Manager to oversee the engagement and management of temporary workers at AWE.



Our supply chain

AWE is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its supply chain, and to acting ethically and with integrity in all its business relationships.

Our "Supplier Code of Conduct" clearly sets out the standards that we expect from our potential and current suppliers, stating that AWE expect suppliers to have suitable procedures in place to ensure they are not directly or indirectly involved in any form of modern slavery. This is repeated through all AWE contractual provisions, which mandates our suppliers and sub-contractors to be compliant with modern slavery legislation. These terms are updated in line with relevant legislation when appropriate and subject to ongoing review to assess the effectiveness of relevant policies and procedures.

We continue to operate with an approved suppliers list, which requires all of our suppliers to confirm they are operating to the standards in the "Supplier Code of Conduct," or they have an equivalent code of conduct including provisions to prevent modern slavery that can be provided to AWE for review at the onboarding stage, or at any time in the AWE-supplier relationship, should it be updated or changed. Suppliers can also be subject to AWE audits and on-site visits from multiple subject matter experts, which could identify potential modern slavery activity.

AWE continues to be a member of the Chartered Institute of Procurement & Supply ("CIPS") and in 2019 continued to work towards the Procurement Excellence Standard award, which AWE received in February 2020. That accreditation included a review of modern slavery prevention methods within the internal AWE supply chain, and how AWE manage awareness

and prevention across our suppliers and subcontractors. Many of AWE's supply chain professionals have completed their individual CIPS certifications and have received training through CIPS on how to identify potential scenarios that could involve modern slavery.

AWE is also a member of the Supply Chain Sustainability School, which provides modern slavery awareness training, and promotes membership of the School to its suppliers. AWE also has its own internal training for employees on modern slavery, which is a mandatory part of the AWE supply chain induction.

This statement constitutes AWE's slavery and human trafficking statement for the financial year ending 31 December 2019.

This Statement was approved by the board of directors of both AWE Management Limited and AWE plc and signed on behalf of AWE Management Limited and AWE plc.

A handwritten signature in black ink, appearing to read 'A. Atkinson', written in a cursive style.

Alison Atkinson Chief Executive Officer,
AWE Management Limited
and AWE plc