

The policy of APC is to conduct all our business in an honest and ethical manner, and to comply with all applicable legislation. We strive to ensure that neither modern slavery nor human trafficking supports our supply chain or our businesses; this objective is implicit in our policies and procedures. We aim for a zero-tolerance approach to violations of anti-slavery and human trafficking laws. If breaches of these laws are found within our supply chain, we will look to support organisations in their efforts to comply with the applicable legislation. However, APC will review the continuation of business with individuals and organisations found to be involved in slavery, human trafficking, forced or child labour and retains the right to cease business with such individuals and organisations on this basis. APC is committed to acting professionally and with integrity in all its business dealings and relationships whether in Ireland, UK or abroad. In this context, APC has created a focused Anti-Slavery and Human Trafficking Policy. We will review this policy and its operation in practice, on a regular basis.

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 in order to exploit them for personal or commercial gain.

Atlantic Projects Company Limited has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

- We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 and Republic of Ireland Criminal Law (Human Trafficking) (Amendment) Act 2013.
- We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

**Billy Nolan, APCL Managing Director**  
**1<sup>st</sup> January 2024**