

Anti-Slavery and Human Trafficking Policy

October 2021

1. POLICY STATEMENT

1.1 Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.

1.2 Pareto Facilities Management Limited has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business and supply chains.

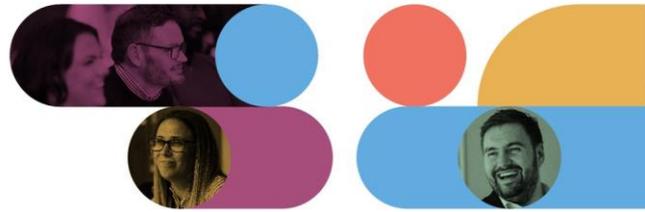
1.3 We are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015.

1.4 Pareto Facilities Management Limited expects our contractors, suppliers and other business partners to uphold high standards in all business practices; as part of the contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, anyone held in slavery or servitude. Pareto Facilities Management Limited expect their suppliers to hold these high standards.

1.5 This Policy applies to all persons working for, or on behalf of Pareto Facilities Management Limited, in any capacity. This includes but does not limit the Policy applicability to; employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives and business partners.

1.6 This Policy does not form part of any employee's contract of employment, and we reserve the right to amend it at any time

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Document Ref:	HSEQ - POL - 000	Author:		Review Date:	
Review No:		Approved by:		Page Number:	1



RESPONSIBILITY FOR THE POLICY

1.1 Pareto Facilities Management Limited's Chief Executive Officer, Andrew Hulbert, has primary responsibility for implementing this Policy. This includes responsibility for the monitoring of its use and effectiveness, auditing of internal control systems and procedures. CTO (Bill Tsang) is also responsible for updating the Policy to reflect any changes in legislation.

2. COMPLIANCE WITH THE POLICY

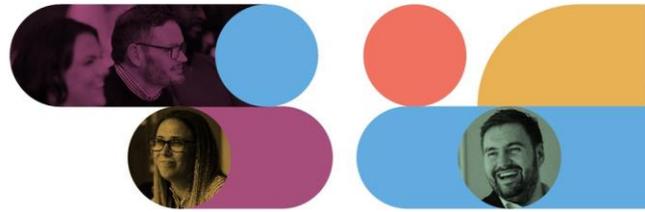
2.1 All Pareto Facilities Management Limited employees must ensure that they read, understand and comply with this Policy.

2.2 All Pareto Facilities Management Limited employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is. Employees are required to avoid any activity that might lead to a breach of this Policy, and the Modern Slavery Act 2015.

2.3 All Pareto Facilities Management Limited employees must notify their manager as soon as possible if they believe or suspect that, a conflict with, or breach of, this Policy has occurred, or may occur, in the future.

2.4 Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage.

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3. COMMUNICATION AND AWARENESS OF THIS POLICY

3.1 This Policy is available on the Pareto Facilities Management Limited Dropbox server.

3.2 Modern Slavery training, which includes identifying signs of Modern Slavery and reporting suspicions of Modern Slavery with Pareto Facilities Management Limited's supply chains, forms part of the induction pack for employees. Refresher training will also be provided as necessary.

3.3 Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking Policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on boarded.

4. BREACHES OF THIS POLICY

4.1 Any employee who breaches this Policy will face disciplinary action. This could result in action up to dismissal in accordance with the Pareto Facilities Management Limited Policy. We may terminate our relationship with other employees, suppliers and any other associates working with Pareto Facilities Management Limited if they breach this Policy.

Andrew Hulbert, Chief Executive Officer

Pareto Facilities Management Limited

August 2021