



Title	Group Anti-Slavery Policy	Issue Date	April-22
Author	Cameron Jackson	Revision No.	05
Approval	Liz Partington	Updated	December-24
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Policy Statement

PAM Group, encompassing PAM OH Solutions Limited and its subsidiary and associated companies, is committed to combating modern slavery in all its forms. Modern slavery, including slavery, servitude, forced or compulsory labour, and human trafficking, is a serious crime and a violation of fundamental human rights.

We have a zero-tolerance approach to modern slavery and are dedicated to conducting our business with integrity, ensuring ethical practices throughout our operations and supply chains. We are committed to transparency and adherence to the Modern Slavery Act 2015. We require the same high standards from all those we engage with, including contractors, suppliers, and business partners.

As part of this commitment, PAM Group enforces strict prohibitions on the use of forced, compulsory, or trafficked labour, as well as slavery or servitude of any kind. We expect our suppliers and their supply chains to uphold these principles.

This policy applies to all individuals working for or on behalf of PAM Group, in any capacity, including employees, directors, agency workers, contractors, consultants, volunteers, and business partners.

Our Commitment

PAM Group ensures that:

1. Employment is freely chosen, and no forced or bonded labour is permitted.
2. Minimum age requirements are adhered to, in line with national laws. In the UK, no one under 16 is employed outside of regulated training or work experience programs.
3. Freedom of association and collective bargaining rights are respected.
4. Working conditions comply with national legal standards.
5. Wages meet or exceed national legal minimums.
6. Working hours do not exceed the legal maximums.
7. Discrimination is prohibited, and mechanisms for employees to raise grievances are in place.

No exceptions to these standards are permitted, irrespective of commercial pressures or circumstances.

Responsibilities

Governance and Oversight

The Board of Directors holds ultimate responsibility for compliance with this policy. The Managing Director oversees its implementation, monitoring, and effectiveness, ensuring our systems and procedures combat modern slavery.

Management and Staff Responsibilities



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- Managers must ensure their teams understand and adhere to this policy, providing regular training where necessary.
- All employees and those working on behalf of PAM Group are responsible for preventing, detecting, and reporting modern slavery.

Raising Concerns

- Concerns about modern slavery must be reported to your manager or the Compliance Manager immediately.
- PAM Group supports open communication and ensures no one faces retaliation for raising concerns in good faith.

Compliance and Enforcement

Training and Communication

- Anti-slavery training is provided as part of the onboarding process for all employees and updated periodically.
- All suppliers, contractors, and business partners are informed of our zero-tolerance stance on modern slavery at the start of the business relationship and reminded regularly.

Reporting and Support

- Employees are encouraged to report any suspected instances of modern slavery within PAM Group or its supply chains.
- Reports will be investigated thoroughly, and support will be offered to affected workers as a priority.

Consequences of Breach

- Violations of this policy by employees may result in disciplinary action, including termination.
- Breaches by external partners may lead to contract termination or other appropriate actions.

Continuous Improvement

PAM Group is committed to continually reviewing and improving our practices to mitigate the risks of modern slavery in our operations and supply chains. This includes periodic audits, supplier assessments, and updates to this policy to reflect changes in legislation and industry standards.