



## 1. Introduction

PandA is deeply committed to upholding human rights and ensuring that our business operations, including relationships with subcontractors, are free from any involvement in slavery or human trafficking. This Anti-Slavery Subcontractor Evaluation Process Policy outlines our procedures for assessing and selecting subcontractors to prevent any engagement with entities associated with slavery or human rights violations.

## 2. Policy Objectives

- a. To prevent any association with subcontractors involved in slavery, forced labour, or human trafficking.
- b. To evaluate and assess the potential risk of slavery and human trafficking in our subcontractor relationships.
- c. To promote transparency, due diligence, and compliance with anti-slavery principles within our supply chain.

## 3. Subcontractor Evaluation Process

### **Step 1: Prequalification**

- a. Before engaging a new subcontractor, PandA will conduct a prequalification process to gather essential information about the subcontractor's business practices and labour standards.

- b. The prequalification questionnaire will include inquiries about the subcontractor's policies on forced labour, child labour, and compliance with anti-slavery laws.

### **Step 2: Risk Assessment**

- a. PandA will perform a risk assessment to evaluate the potential risks associated with engaging the subcontractor.
- b. Factors considered during the risk assessment may include the subcontractor's geographical location, industry sector, past history of labour violations, reputation, and any known connections to high-risk regions or sectors.

### **Step 3: Due Diligence**

- a. Based on the risk assessment, selected subcontractors may be subject to a more comprehensive due diligence process.
- b. Due diligence may involve interviews, reference checks, reviewing past business transactions, and assessing the subcontractor's internal controls related to labour practices and policies

### **Step 4: Anti-Slavery Commitments**

- a. Prior to finalizing the subcontractor relationship, PandA will require subcontractors to sign an Anti-Slavery Commitment statement.
- b. The Anti-Slavery Commitment statement will reaffirm the subcontractor's understanding of our anti-slavery policy and their



commitment to adhering to all applicable labour laws and ethical standards.

### **Step 5: Ongoing Monitoring**

- a. PandA will establish an ongoing monitoring process to review the performance and conduct of subcontractors periodically.
- b. Any indication of potential slavery, forced labour, or human trafficking will be thoroughly investigated, and appropriate actions will be taken, which may include termination of the subcontractor relationship..

### **4. Reporting Mechanisms**

Employees and representatives of PandA are encouraged to report any concerns or suspicions related to slavery, forced labor, or human trafficking involving subcontractors through a confidential reporting channel. Whistleblowers will be protected, and confidentiality will be maintained to the extent allowed by law.

### **5. Compliance and Consequences**

Non-compliance with this Anti-Slavery Subcontractor Evaluation Process Policy may result in disciplinary action, up to and including termination of employment or business relationships.

### **8. Policy Reviews and Updates**

This policy will be reviewed periodically to ensure its effectiveness and alignment with changing laws, regulations, and best practices.

By adhering to this Anti-Slavery Subcontractor Evaluation Process Policy, PandA demonstrates its unwavering commitment to eradicating slavery and human trafficking in all subcontractor engagements.

This policy is effective from 20 July 2023.

