



ASTON MARTIN

ANTI-SLAVERY & HUMAN  
TRAFFICKING POLICY

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## PART 1: INTRODUCTION

Aston Martin's anti-slavery and human trafficking policy is introduced in accordance with the Modern Slavery Act 2015. The policy is intended to give our employees, contractors and other business partners direction on Aston Martin's approach to modern slavery and human trafficking and the measures that Aston Martin has put in place to prevent acts of modern slavery and human trafficking from occurring in the business and supply chain.

## PART 2: WHO DOES THIS POLICY APPLY TO?

This Policy applies to everyone working at Aston Martin globally, including permanent and temporary employees, contractors, agency workers, suppliers and business partners.

## PART 3: OUR COMMITMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as forced and compulsory labour, exploitation of an individual's services with no economic reward 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.

Aston Martin is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. Aston Martin will act ethically and with integrity in its business dealings and relationships and will implement and enforce effective systems and controls to ensure modern slavery does not take place anywhere in its own business or in its supply chains.

Aston Martin aims to ensure transparency throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015 and we expect the same high standards from all of our contractors, suppliers and other business partners and we expect that our suppliers will hold their own suppliers to the same high standards.

Accordingly, we will:

- Provide induction and annual training to all people who work for Aston Martin, addressing the objectives of this policy, raising awareness of the issue of modern slavery and the potential risks of the modern slavery occurring in our supply chains.
- Issue the Aston Martin Responsible Procurement Policy to all our suppliers, aimed at ensuring our values are adhered to and respected.
- Conduct due diligence in relation to new suppliers and communicate the objectives of this policy and the risk of modern slavery in supply chains to all suppliers, contractors and business partners at the outset of our business relationship.

- Conduct regular audits of suppliers to establish where potential risks may lie and to ensure that suppliers have also taken steps to prohibit modern slavery within the supply chain.
- Require suppliers, as a matter of contract, to ensure that they:
  - (i) will not use forced or under-age labour;
  - (ii) will comply with the terms of the Modern Slavery Act and the Responsible Procurement Guide,
  - (iii) will co-operate with any modern slavery audit, questionnaire or site visit instigated by Aston Martin;
  - (iv) will notify Aston Martin if it becomes aware that any of its officers or employees have breached the terms of the Modern Slavery Act 2015.
- Operate a cross functional working group including representation from Procurement, Human Resources, Legal, Internal Audit & Risk Management, with responsibility for monitoring progress against identified key performance indicators, implementing and maintaining the relevant policies, communication and training on modern slavery across the business and throughout the supply chain.
- Implement mitigation activities to address supply chain risks that may arise.

It is the responsibility of all employees to comply with the policy and to ensure that slavery or human trafficking is not taking place anywhere in our business. Should employees breach this policy they may be subject to appropriate disciplinary action by Aston Martin, up to and including dismissal. Should the breach be by a supplier, contractor or other business partner, Aston Martin will terminate the contract.

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Director of Internal Audit and Risk is responsible for implementing this policy, monitoring its use and effectiveness, dealing with any queries and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given appropriate and regular training on it and the issue of modern slavery in supply chains.

We all have an obligation to speak up if we see behaviour that is not in-line with these. We encourage anyone who sees any breach of this policy to speak up using the approaches outlined below.

If you witness any behaviour that concerns you, you should raise your concerns to:

- Your line manager
- A member of management
- HR
- Aston Martin Employee Assistance Programme (EAP)
- The whistleblowing facility

In all cases where concerns are raised that there has been a breach of this policy, we will ensure that the situation is handled appropriately and that an investigation is carried out. We will take appropriate action where required and provide any support to all involved as needed.

Anyone making a complaint should be assured that they will be protected from retaliation. We will not tolerate retaliation against anyone who reports a breach of this policy and/or who participates in an investigation about a breach of this policy.

## PART 4: REVIEW

This policy does not form part of any Aston Martin employee's contract of employment.

Aston Martin reserves the right to amend any policies or procedures outlined within this policy as deemed appropriate (including, but not limited to, changes required to comply with local legal or regulatory requirements) and any decision to do so will be made entirely at Aston Martin's discretion.

This policy will be reviewed and may be amended at any time.

We expect anyone working for, or with Aston Martin, adhere to any instruction or policy provided.

Thank you for your support.

Tobias Moers  
Chief Executive Officer

Date: 17 November 2021