

# The Emirates Group Anti-Slavery and Human Trafficking Policy



## I. General Principles

- 1.1 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.
- 1.2 The Group complies with all of the laws of the countries in which it operates. Amongst these are the laws relating to anti-human trafficking and anti-slavery laws. The Group has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not tolerated in our own business or in any of our supply chains.
- 1.3 The Group is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, in line with the disclosure obligations under the Modern Slavery Act 2015. The Group expects the same high standards from all of our contractors, suppliers and other business partners.

## 2. Scope

- 2.1 All Group employees, officers and directors, as well as anyone acting on behalf of the Group or any Group company must comply with this policy.
- 2.2 Management at all levels are responsible for ensuring those reporting to them are aware of the issue of modern slavery and understand and comply with this policy. Any Group employee who has any questions in respect of this policy should address this to local management.

## 3. Guidelines

- 3.1 Group employees must ensure that they read, understand and comply with this policy.
- 3.2 The prevention and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for the Group or under its control. Group employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 Group employees must notify their manager or report it in line with the applicable whistleblowing procedures as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chains constitutes any of the various forms of modern slavery, raise it with your manager.
- 3.5 The Group aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

## 4. Communication and Awareness of this Policy

- 4.1 Each Group company must seek to ensure that the Group's zero-tolerance approach to modern slavery is communicated to all employees, suppliers, contractors and business partners.
- 4.2 As part of the contracting processes, you must include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the Group expects that our suppliers will hold their own suppliers to the same high standards. For assistance in drafting appropriate clauses, please consult your normal source of legal advice.

## 5. Breaches of this Policy

- 5.1 Any Group employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct.
- 5.2 The Group may terminate its relationship with other individuals and organisations working on our behalf if they breach this policy.