



Anti-Slavery and Human Trafficking Policy

Process Owner: **Administration**

Management:

1. Scope:

This document details Fluid Conditioning Products, Inc's policy on slavery and human trafficking.

2. Policy Statement:

Fluid Conditioning Products, Inc has a zero tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity. Fluid Conditioning Products, Inc expects high standards from all of its employees.

This policy applies to all individuals working for Fluid Conditioning Products, Inc or that work on Fluid Conditioning Products, Inc's behalf in any capacity.

3. Responsibility:

Top Management has overall responsibility for ensuring that this policy complies with Fluid Conditioning Products, Inc's legal and ethical obligations.

Top Management has day-to-day responsibility for implementing this policy and monitoring its use and effectiveness.

Managers are responsible for ensuring that those reporting to them understand and comply with this policy

4. Compliance:

The prevention, detection, and reporting of modern slavery and human trafficking in any part of Fluid Conditioning Products, Inc's business operations is the responsibility of all those working for Fluid Conditioning Products, Inc's. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of, or conflict with, this policy has occurred or may occur, you must notify your manager. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of Fluid Conditioning Products, Inc's business as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of Fluid Conditioning Products, Inc business constitutes any of the various forms of modern slavery, please raise it with your manager. Fluid Conditioning Products, Inc 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. Fluid Conditioning Products, Inc is committed to ensuring no one suffers any detrimental treatment or victimization as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

5. Training and Communication:

Training on this policy, and on the risk of what the business faces from modern slavery and human trafficking, will be provided as necessary.

Fluid Conditioning Products, Inc's zero tolerance approach to modern slavery and human trafficking will be communicated to all.

Fluid Conditioning Products, Inc will distribute revised policies as and when deemed necessary or appropriate in accordance with internal/external compliance and as in accordance with statutory requirements.

6. Breach of the Policy:

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.



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Applicable Documents

NA

Applicable AS9100/ISO 9001 Clauses

NA

Previous Documents

NA

Record Requirements

Record I.D.	Document Name	Active Storage Location	In-Active Storage Location	Retention Time (Minimum)	Disposal Method
NA					

Revision History

Training Required? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	Rev	Pages or sections affected			Date
		Revised	Added	Removed	
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	-		Initial release		10/31/17
YES <input type="checkbox"/> NO <input type="checkbox"/>					
YES <input type="checkbox"/> NO <input type="checkbox"/>					
YES <input type="checkbox"/> NO <input type="checkbox"/>					