

Modern Slavery and Human Trafficking policy statement for year 2020

This statement applies to all companies within and associated to Ashcourt Group (referred to in this statement as The Group). The information included in the statement refers to the year 2020.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Ashcourt has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Ashcourt has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Ashcourt Group

Ashcourt Group is committed to delivering the highest levels of customer service whilst protecting the environment and providing a safe and healthy workplace for our employees and others.

Organisational Structure

Ashcourt Group has numerous branches across the East Yorkshire Region they are classed as different divisions within the same organisation.

Head Quarters for Ashcourt Group are at Ashcourt House, Cottingham Road, Hull.

Ashcourt Policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- *Anti-Slavery Policy*- This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- *Working within the UK*- Work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- *Whistleblowing policy*- Ashcourt operate a whistle blowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practice within our business or supply chain, without fear of reprisals.
- *Code of Ashcourt conduct*- This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- *Ethical sourcing policy*- This policy sets to source and purchase goods and services which are produced and delivered under conditions that do not involve or support the abuse or exploitation of any persons

Definitions

Ashcourt Group Limited considers that modern slavery encompasses:

- Human trafficking

- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment

Ashcourt Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Ashcourt Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Ashcourt Group Limited does not enter into business with any other organisation, in the United Kingdom or abroad which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Ashcourt Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Ashcourt Group Limited strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

Ashcourt suppliers

Ashcourt operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and onsite audits which include a review of the working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are requested to confirm that no part of their business operations contradicts this policy.

As part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- Child or forced labour or non voluntary prison labour
- Conditions of work, establish recognised employment relationship with their employees that are in accordance with their national law and good practice and do not seek to avoid providing employees with their legal or contractual rights.
- Health and Safety; provide a safe and healthy working environment and have adequate systems to prevent accidents and injury at work.
- All forms of Discrimination
- Wages; ensure that wages paid for a standard working period meet legal and/ or industry minimum standards
- Hours of work; compliance of the requirements on the maximum allowable hours in a standard working period.

- Environment
- Ashcourt may terminate the contract at any time should any instances of modern slavery come to light.

Potential Exposures.

In general Ashcourt Group Limited considers its exposure to slavery/ human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/ or services to it.

Steps.

Ashcourt Group limited carries out due diligence processes in relation to ensuring slavery and/ or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Ashcourt Group Limited has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54 (4) of the modern slavery Act 2015, Ashcourt Group Limited has taken steps to ensure that modern slavery is not taking palce:

- Reviewing the suppliers contract to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- Measures in place to identify and assess the potential risks in its supply chain
- Undertaking impact assessments of its services upon potential instances of slavery
- Creating action plans to address risk to modern slavery
- Any action taken to embed a zero tolerance policy towards modern slavery

Ashcourt performance indicators

Ashcourt will know the effectiveness of the steps that we are taking to ensure that slavery and/or guman trafficking is not taking place within our business or supply chain. However if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Signed:



Kurt Bousfield

Ashcourt Group Managing Director

Date: 22/01/2020