# Modern Slavery, Human Rights and Human Trafficking Policy



2nd Floor Hindsford House, Printshop Lane, Atherton, M46 9BJ

Tel: 0161 518 4232

### 1.0 GENERAL STATEMENT

**ASH Integrated Services Ltd** and our employees recognise the legal obligations placed on them by the **Modern Slavery Act 2015** and of any other statutory provisions applying to our activities, with regards to:

- Eradicating human trafficking and slavery from our supply chains
- Opposing any use of slavery or human trafficking in the manufacture and distribution of our products
- Provision of adequate resources to discharge our duties under the Modern Slavery Act
- Maintaining internal accountability standards for employees or contractors failing to meet company standards regarding slavery and human trafficking.
- Prompt and thorough investigation of any claim or indication that a supplier is engaging in human trafficking or slave labour.
- Suppliers not using slave labour, illegal child labour or forced labour.
- Suppliers following all local applicable laws pertaining to minimum age requirements, wages, working hours and benefits.
- Suppliers periodically certifying they conform to the expectations described above and that all materials incorporated into their products comply with the laws regarding human trafficking and slavery of the country or countries in which they are doing business
- Provision of such information, instruction, training and supervision as is necessary to ensure that relevant
  employees are aware of their duties to eradicate slave labour, illegal child labour or forced labour or slave
  labour.
- Reviewing and revising this policy at regular intervals not exceeding annually.

Employees and sub-contractors have a duty to co-operate in the operation of this policy by fulfilling the responsibilities placed upon them.

As stated, the operations of the company and this policy will be reviewed at regular intervals or in light of changing company circumstances, procedures and legislation. These changes will be brought to the attention of employees and others who might be affected by such changes.

Signed:

**Antony Grace (Managing Director)** 

Date:

1<sup>st</sup> June 2024

Review Date:

1st June 2025

# 2.0 ORGANISATION AND RESPONSIBILITIES

The Managing Director of **ASH Integrated Services Ltd**, and the other members of the board of directors, will make available adequate resources for the implementation and monitoring of Modern Slavery, Human Rights and Human Trafficking Policy and holds overall and final responsibility for ensuring the organisation complies with modern slavery legislation. He shall also be responsible for the establishment of structures through which modern slavery matters can be dealt.

To assist in the eradication of human trafficking and slavery from our supply chains the Managing Director has the help of all employees.

All Employees must co-operate with supervisors and managers by complying with all slavery, human rights and human trafficking matters. Employees will report all slavery, human rights and human trafficking concerns to the appropriate person.

Administration staff should maintain a record of suppliers, subcontractors and subcontract companies to identify the legitimacy of the service or supply of goods

### 3.0 PROCEDURES

This policy outlines the efforts **ASH Integrated Services Ltd** will make to seek to eradicate human trafficking and slavery from our supply chains. **ASH Integrated Services Ltd** opposes any use of slavery or human trafficking in the supply of services, manufacture and distribution of products and fully supports the promotion of ethical and lawful business practices within our workplace. **ASH Integrated Services Ltd** will not tolerate or condone any form or practice that constitutes human trafficking or slavery in any part of our company.

**ASH Integrated Services Ltd.'s** suppliers are an important part of our success and our culture. We expect each of these business partners to conduct their business with the same commitment to ethical business practices as ASH Integrated Services Ltd. The workplace practices that we expect from our suppliers include:

- Not to use slave labour, illegal child labour or forced labour.
- o Insuring that the overall terms of employment are voluntary.
- To follow all local applicable laws pertaining to minimum age requirements, wages, overtime and benefits.
- o To follow all local applicable laws pertaining to the number of hours worked in a seven (7) day week.
- Periodically certifying that they conform to the expectations described above and that all materials incorporated into their products comply with the laws regarding human trafficking and slavery of the country or countries in which they are doing business.

Suppliers must be able to demonstrate compliance with this policy at the request and satisfaction of **ASH Integrated Services Ltd.** 

**ASH Integrated Services Ltd** will assess the risk of suppliers and other organisations they are connected with for being engaged in human trafficking or slave labour.

Where the risk of human trafficking and slavery is high, **ASH Integrated Services Ltd** will conduct internal verification of product supply chains to evaluate and address risk.

ASH Integrated Services Ltd will maintain internal accountability standards for employees or contractors failing to meet company standards regarding slavery and human trafficking. ASH Integrated Services Ltd will promptly and thoroughly investigate any claim or indication that a supplier is engaging in human trafficking or slave labour. If a supplier of ASH Integrated Services Ltd is found in violation of this policy, ASH Integrated Services Ltd will take prompt, remedial measures to address the violation.

**ASH Integrated Services Ltd** will provide ongoing training to its employees, including those who have direct responsibility for supply chain management, on the laws and **ASH Integrated Services Ltd** 's policy against human trafficking and slavery.

Assessment of risk of slavery and human trafficking should consider issues such as: -

# **Positive issues**

Is the organisation known to you for a long period with regular trading?

Has a member of your company visited the organisation and not raised concerns of human trafficking?

Is the supplying organisation within the UK/EU?

Are the items being purchased high quality, technical, complex scientific?

# Issues which may cause further investigation

Are the items being purchased low value high quantities?

Is the supplying industry known to be an industry involved in gang labour, slave labour or restrictive practices?

Are the goods or services imported from areas of the world where it has been reported there are poor employment practices or slave labour?

Would the supplying organisation be difficult to visit unannounced?