



MODERN SLAVERY POLICY

Policy Statement

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. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers, and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility for the Policy

Management at all levels has responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels is responsible for ensuring that those reporting to them understand and comply with this policy and are given any required training.

Organisation Structure and Supply Chains

The nature of our business is Scaffolding Services. The Company has approximately 25 employees with business operations in the United Kingdom.

Our procurement activities cover a wide range of goods across diverse supply chains across the Construction Sector. The Company has supply chains which operate in the UK and Europe.

Workers are recruited at various stages of the supply chain through direct hires, third-party providers and subcontracting arrangements.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Our employees, business partners, supply chains and the general public are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

Policies in Relation to Slavery and Human Trafficking

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include the following:

- Right to Work Policy (ASH99)
- Whistleblowing Policy (ASH54)



Due Diligence Processes

The Company maintains robust recruitment procedures to ensure that candidates have the right to work in the UK through documentation checks prior to employment. The Company conducts reference checks to validate employment history and ensures that employees are paid directly into a verified bank account under the employee's name.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.
- External supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

Risk Assessment And Management

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment due to working with countries where human rights protections are more limited; therefore, we have a lower exposure to modern slavery.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

Key Performance Indicators to Measure the Effectiveness of Steps Being Taken

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking are not taking place in its business and supply chains.

- We will not use suppliers without enquiring about their modern slavery practices prior to doing any business with them
- We will contact suppliers to enquire about their modern slavery practices every 12 months.
- We will audit our employee and worker files to ensure that the right of work is up to date and has been completed correctly.

Compliance

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your Manager or report it in accordance with our Whistleblowing Policy as soon as possible.



If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your Manager.

We aim 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.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or any part of our supply chain. If you believe you have been subjected to such treatment, please inform your manager immediately.

Communication and Awareness

Training on this policy, and on the risk our business faces from modern slavery in its supply chain, will be given where needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Policy Breaches

Any employee who breaches this policy may face disciplinary action, up to and including dismissal.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

**For and on behalf of
Ashton Scaffolding Services Limited**

A handwritten signature in black ink, appearing to be "P. Farmer", written over a light blue horizontal line.

**Mr Paul Farmer
Managing Director**