



## Modern Slavery and Human Trafficking Policy Statement QM708

### Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015.

Ascot Services UK Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

### Organisational Structure

Ascot Services UK Ltd operates solely in the United Kingdom.

We operate in the Facilities Management and Construction Services sector. The nature of our supply chain is as follows; We work with a number of key direct suppliers, who provide us with goods, materials and subcontracted services, such as engineering, waste management and IT Services.

For more information about the Company, please visit our website: [www.ascotservices.com](http://www.ascotservices.com)

### Policies

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

These include the following:

- **Equal Opportunities Policy** - This policy provides a framework for ensuring the equal opportunities of all employees and safeguarding against discrimination. The aim of the policy is to ensure no job applicant or employee is discriminated against either directly or indirectly on any unlawful grounds.
- **Recruitment and Selection Policy** (included in Equal Opportunities Policy) – We conduct checks on all prospective employees to verify that they are eligible to work in the UK. In addition to this, certain roles require a Disclosure and Barring Service (DBS) check which is carried out accordingly.
- **Supplier Terms & Conditions** – We operate these Terms & Conditions to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.

- **Whistleblowing Policy** – We operate this policy so that employees are able to raise concerns about how staff are being treated or practices within our business or our supply chains without fear of reprisal.

We make sure our suppliers are aware of our policies and adhere to the same standards.

### **Due Diligence**

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 Approval Process

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 whistle-blowers

### **Risk and compliance**

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 all aspects of the supply chain based on supply chain mapping

We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in the UK.

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.

### **Effectiveness**

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

- We train our staff about modern slavery issues and increase awareness within the Company.

### **Training our staff**

The company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- All colleagues have received communications which provided them with a high-level overview of what is meant by Modern Slavery and Human Trafficking, the methods

by which Ascot looks to combat it and to re-iterate that the company's stance is of zero tolerance in regard to this matter.

### **Policy Review**

This policy will be communicated to all employees working for or on our behalf.

This policy will be reviewed annually by Senior Management and, where deemed necessary will be amended and re-issued. Previous versions of this policy are archived.

This policy is available to relevant interested parties, upon reasonable request.

Signed

A handwritten signature in black ink, appearing to read "Ashurst".

**Andrea Ashurst**  
**Compliance Manager / Company Secretary**