



## 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.

enquiries@ascotservices.com | 01942 879 444 | ascotservices.com

Ascot Services UK Ltd, Kestrel House, Gibfield Park Avenue, Atherton, Manchester M46 0SU

### **Reporting and response**

We encourage employees, suppliers, subcontractors and other business partners to raise concerns about suspected modern slavery or human trafficking linked to our operations or supply chains. Concerns can be raised via line management or through the Company's Whistleblowing Policy. We do not tolerate retaliation against anyone who raises a concern in good faith.

All concerns are recorded and assessed, and we will investigate in a timely manner. Where risks are identified, we will take appropriate action, which may include engaging with the supplier to understand root causes, requiring corrective actions, and verifying completion. Where serious breaches are identified or remediation is not achieved, we may suspend or terminate the relationship and, where appropriate, report matters to relevant authorities.

### **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:

- Risk-based supplier onboarding and approval, including screening of higher-risk suppliers and labour providers
- Contractual requirements (including adherence to applicable modern slavery laws and our Supplier Terms & Conditions) and expectations that suppliers flow down requirements to their own supply chains where relevant
- Use of supplier questionnaires and/or declarations, proportionate to the risk and type of service provided
- Supply chain mapping and review of subcontracting arrangements, including where agency labour is used
- Periodic re-assessment of key suppliers (and additional review where risks change or concerns are raised)
- Site/operational checks where appropriate to the work being delivered, including identification of modern slavery "red flags"
- Processes to record, investigate and address concerns, including escalation routes and corrective action plans
- Ongoing review to ensure controls remain appropriate and effective

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

While we operate solely in the UK, we recognise that the risk of modern slavery and human trafficking can still arise in UK supply chains, particularly where subcontracting and agency

labour are used, and in labour-intensive services such as facilities management, construction, waste and logistics. We assess risk based on the nature of goods and services provided, the use of subcontractors and labour providers, the location of labour and sourcing, and any relevant sector risk indicators, and we apply proportionate controls based on the level of risk identified.

We do not tolerate slavery and human trafficking in our operations or supply chains. Where concerns are identified, we will take prompt and proportionate action, which may include investigating the matter, requiring corrective actions and evidence of remediation within agreed timescales, and escalating to suspension or termination of the relationship where appropriate. Where relevant, we will seek to support a victim-centred approach and avoid actions that could increase harm to affected workers.

### **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:

- Percentage of new suppliers (and labour providers) that complete modern slavery due diligence prior to engagement
- Percentage of key suppliers reviewed/assessed
- Number of supplier/site checks completed where appropriate, and the proportion of findings closed out within agreed timescales
- Number of concerns raised through management/whistleblowing channels and the time taken to assess and close them (where reporting is appropriate)

### **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:

- Induction and refresher communications/training for colleagues, covering what is meant by Modern Slavery and Human Trafficking, common warning signs ("red flags"), how Ascot seeks to prevent it, and how to raise concerns through management or the Whistleblowing Policy.

### **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

*Andrea Ashurst*

**Compliance Manager / Company Secretary**