



ANTI-SLAVERY POLICY

Aspex UK Ltd is committed to compliance with section 54 of the Modern Slavery Act 2015 and this policy sets out the responsibilities for employers and employees.

Aspex UK Ltd is committed to ensuring that its business operations are free from involvement with slavery or human trafficking.

Supply Chain

- We will work with our suppliers and Clients to ensure that we all ensure that the requirements of the Act are complied with.
- We will ensure that our supply chain is transparent in their obligations to the Modern Slavery Act and that we have confidence in those goods and services being provided by workers who do so at their own free will.

Responsibilities

It is the responsibility of the Compliance Manager to:

1. ensure that all staff that are engaged by the Company are within the UK legally and they have a legal right to work.
2. to obtain evidence from the Aspex supply chain that they comply with the requirements of Modern Slavery Act 2015 and that they have suitable policies in place to prevent breaches of the act in their organization.
3. review and publish this policy annually
4. carry out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
5. ensure that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
6. ensure that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure

Reporting of Incidents

It is the requirement of all Responsible Managers that any non-compliance with the Modern Slavery Act 2015 report this to their Immediate Responsible Manager/Director.

It is also the requirement of all Responsible Managers/Directors to report to inform to the Police if they believe that a crime has been committed in relation to the Modern Slavery Act 2015.

Training

The Company will ensure that suitable and sufficient training about slavery and human trafficking is given to the Responsible Managers/Directors.

The Company will ensure that all Supervisors and Operatives are given an overview of the Modern Slavery Act and issued with a copy of this Statement of Intent.


The Company will ensure that if requested, in writing, that a copy of the company's Modern Slavery Act Statement is issued within 30 days of the request.

Procedures:

1. ASP OP 102 Recruitment and New Starters (R4)
2. All new employees are to complete a New Employee Information form, which must include their National Insurance Number and either their passport, or another form of ID (for example driving licence) along with an official letter from HMRC including their NI number.

Employees should contact the Compliance Team: Paul Ashberry (paul@aspex.co.uk) or Nicola Cleaver (nicola@aspex.co.uk), if they have any questions or concerns about the policy. Please note this policy will be reviewed annually.

This policy has been approved and reviewed by:

Date	Name & Position	Signature
26 th January 2024	Paul Ashberry – H&S Manager	

An annual review will be carried out if not reviewed beforehand, where the policy will be re-issued to all staff via email. Past versions of the policy can be found in the 'previous revisions folder'.