

ANTI-SLAVERY POLICY

031 POL Aspex

Our Statement

Aspex UK Ltd is committed to compliance with section 54 of the Modern Slavery Act 2015 and this policy sets out the responsibilities of employers and employees. Aspex UK Ltd is committed to ensuring that its business operations are free from involvement with slavery, human trafficking, forced or bonded labour in any part of our business. We will collaborate with our Suppliers and Clients to guarantee compliance with all requirements of the Act. We will ensure our supply chain remains transparent in its obligations to the Modern Slavery Act, giving us confidence that the goods and services provided are produced by workers freely and willingly.

Responsibilities

It is the responsibility of the Compliance Manager to:

- Ensure that all staff that are employed by Aspex are within the UK legally and have a legal right to work.
- Obtain evidence from the Aspex supply chain that they comply with the requirements of the Modern Slavery Act 2015 and that they have suitable policies in place to prevent breaches of the act in their organisation.
- Review and publish this policy annually.
- 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.
- Ensure that slavery and human trafficking are considered and addressed in our approach to corporate social responsibility.
- 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 to their Immediate Responsible Manager/Director. It is also the requirement of all Responsible Managers/Directors to report to inform the Police if they believe that a crime has been committed in relation to the Modern Slavery Act 2015.

Training


Aspex will ensure that suitable and sufficient training about slavery and human trafficking is given to the Responsible Managers/Directors. Aspex will ensure that all Supervisors and Operatives are given an overview of the Modern Slavery Act and issued with a copy of this policy. Aspex will ensure that if requested, in writing, a copy of Aspex's Modern Slavery Act Statement is issued within 30 days of the request.

Procedures

- ASP OP 102 Recruitment and New Starters (R5).
- 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 SHEQ team: Paul Ashberry (paul@aspex.co.uk), Stef Trent (stefan@aspex.co.uk) or Nicola Cleaver (nicola@aspex.co.uk), if they have any questions about the act or the policy. Please note this policy will be reviewed annually.

This policy has been approved and reviewed by:

Date	Name & position	Signature
09/02/2026	Paul Ashberry - Director	

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'.