

MODERN SLAVERY POLICY STATEMENT

Modern slavery is a crime and gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which, deprive a person's liberty in order for another person to exploit them for personal or commercial gain. With a zero-tolerance approach to modern slavery, ACS are committed to acting ethically and with integrity in all our business dealings and relationships, as well as implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our business or in our supply chain.

Given the nature of what we do, we believe that there is a low risk of slavery or a connection to human trafficking within our business activities. However, we are committed to ensuring there is transparency within our own business, as well as in our approach to tackling modern slavery throughout our supply chain, consistent with our obligations under the Modern Slavery Act 2015.

We expect the same commitment from 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, whether they are adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

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

1. Modern Slavery Human Trafficking Policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment Policy. We operate a robust recruitment policy, which includes checking that employees are eligible to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
3. Ethics Policy. Within the policy it advises on the whistleblowing mechanism so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our Supply Chains

ACS operates a supplier verification process and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

Training

We provide training to our staff to ensure a high level of understanding of the risks of modern slavery trafficking in our supply chains and our business.

Assessment of Effectiveness in Preventing Modern Slavery

We recognise that modern slavery risk continues to evolve, and we will develop our risk assessment tools and controls in the coming year to ensure that we continue to strengthen our approach.

During the year, we are continuing to develop appropriate Key Performance Indicators to measure and report on our progress in managing slavery risks within our business and supply chains.

In order to assess our effectiveness for preventing slavery and human trafficking, we will review the following key performance indicators:

- Training of staff on slavery and human trafficking
- Disclosure of the total number of non-compliances in relation to slavery and human trafficking.

This statement for the financial year ending 2022 is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that ACS has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.



Signed:

Chris Frampton-Love
Managing Director

Date: 03/01/2023