

Anti-Slavery and Human Trafficking Policy

Assembly Contract Ltd



As a company, ACL maintains relationships with many different organizations in its supply chain, as well as employing people directly into various roles within the organization. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chains.

The policy below indicates our approach and commitment to modern slavery.

ACL has adopted a statement of our company value on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all persons or organizations with whom we contract directly or who we appoint to act on our behalf.

We expect all or who have, or seek to have, a business relationship with ACL and/or any member of our company, to familiarize themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery value & policy.

Our commitment:

Assembly Contract Ltd Anti-Slavery Value & Policy

As part of our culture of good business, at ACL we operate to a set of core values which reflect our relationships with our customers, manufacturers, suppliers and employees. We adopt a good behavior value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and pre-venting it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

Our attitude to modern slavery is: zero tolerance.

1. Purpose of this Policy

- Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.
- This document sets out the policy of ACL with the aim of the prevention of opportunities for modern slavery to occur within its business or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

Ref No: ASHT001

Owner: Quality Director

Date: 26th April 2022

Issue: 02



2. Steps for the Prevention of Modern Slavery

- We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business & ACL (only) suppliers, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our ACL (only) suppliers, our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our ACL (only) suppliers to hold their own suppliers to the same high standards. It is the responsibility of our Customers to ensure “specified suppliers” are in compliance with the act.
- All employees have an obligation to familiarize themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees’ obligations under their contract of employment.
- Whilst recognizing our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our business or ACL supply chains, we acknowledge that we do not control the conduct of individuals and organizations in our ACL supply chains. To underpin our compliance with practical steps, we have implemented the following measures:
 - conduct risk assessments prior to employment of person into ACL role within the Company by implementing the following steps:
**Employees sign & date HM Revenue & Customs starter checklist (complete with National Insurance Number).
HMRC letter to current address.
Complete “Personnel Details” form providing Passport details with photo copies taken to prove identity along again with national insurance number.**
 - Ascertain which of our ACL (only) suppliers are most at risk of modern slavery so that efforts can be focused on those areas. These suppliers are to complete & return:
“ACL-ASHT Supplier Self-Assessment Form”
 - ACL only purchases items from our “Approved Supplier List” in which “Client Specified” suppliers are also listed. Majority of suppliers listed are ISO 9001 Approved which is monitored regularly monitored.
 - Supplier pre-screening of new ACL (only) suppliers to ascertain compliance with Modern Slavery Act 2015 to be undertaken using:
Supplier Quality Assurance & Risk Assessment Report (QF8)
 - Supplier Audits can be carried to ascertain adherence to the policy (as applicable) both routinely and at times of reasonable suspicion using:
Supplier Quality Assurance & Risk Assessment Report (QF8)



3. Responsibility for the Policy

- Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The directors of the Company have overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.
- Managers & Supervisors at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given training with present issue of the policy displayed on the "ACL Notice Board".

4. Actions to Report Modern Slavery or Human Trafficking

- Whistleblowing Procedure – direct access to senior management
The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our ACL suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees.
- In summary, employees should approach either their Manager/Supervisor. If the matter is extremely serious then a director of the Company should be approached. The nature of the complaint will determine the Company's next course of action.
- Employees or any other person wishing to raise a concern should report under the following circumstances:
 - You suspect a person acting on behalf of ACL is seeking to exploit another in a way which could amount to modern slavery.
 - You suspect that a person acting on behalf of one of our ACL (only) suppliers is seeking to exploit another in a way which could amount to modern slavery.
 - You have received an approach from a person acting on behalf of ACL who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed.
 - You have information which leads to the rational conclusion that a person acting on behalf of ACL or ACL (only) suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Anti-Slavery and Human Trafficking Policy

Assembly Contract Ltd



5. Safeguards

- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our ACL supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.
- However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.
- Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

6. Communication & Awareness of this Policy

- Our zero-tolerance approach to modern slavery will be communicated to all ACL (only) suppliers and employees at the outset of our business relationship or employment with them and reinforced as appropriate thereafter.

7. Review

Following its initial release, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Directors on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking.

Ref No: ASHT001

Owner: Quality Director

Date: 26th April 2022

Issue: 02