



MODERN SLAVERY POLICY STATEMENT

For the financial year 2020

Issued pursuant to Section 54 of the Modern Slavery Act 2015

Ash & Lacy is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure slavery or human trafficking is prevented.

Ash & Lacy commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Ash & Lacy are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the world we operate.

Ash & Lacy will constantly uphold all laws relating to slavery or human trafficking in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Modern Slavery Act 2015, in regards to our conduct both at home and abroad.

Ash & Lacy recognises that Modern Slavery & Human Trafficking are punishable by up to life imprisonment. It is with this in mind that we commit to preventing Modern Slavery & Human Trafficking in our business, and take our legal responsibilities seriously.

Policy Commitments

Ash & Lacy shall:

1. Ensure that all Employees receive training to have a basic awareness of the signs of Modern Slavery or Human Trafficking and the procedures to report suspicions.
2. Accept that job finding fees are a business cost, and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third-party labour exploitation and signs to look for and have signed the Recruitment “Declaration of Compliance”.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the police.
6. Provide information on tackling “Modern Slavery”, “Human Trafficking” and “Hidden Labour Exploitation” to our workforce in a variety of formats such as workplace posters, worker leaflets, induction, or other training as appropriate.
7. Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

In 2021 Ash & Lacy plans to:

- Provide further training and support to its employees.
- Review and update Modern Slavery and Human Trafficking Policy to ensure it remains up to date.
- Reiterate to staff, workers and contractors the whistleblowing processes through which they can raise concerns about suspected malpractice in strict confidence.

Signed by:

A handwritten signature in black ink, appearing to read 'Jonathan Evans', written in a cursive style.

Jonathan Evans
CEO & Chairman
30 July 2021