



## **Modern Slavery Policy Statement 2021**

In accordance with the Modern Slavery Act 2015, Aspens Services Limited ("Aspens") and its associated businesses is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively "human trafficking and slavery"). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Accordingly, Aspens and any of our associated businesses will not knowingly use unlawful child labour or forced labour in any of the utilities and/or other commodities, products and/or services it provides, nor will it accept commodities, products and/or services from suppliers that employ or utilize child labour or forced labour.

### **Rationale**

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This policy statement thus defines Aspen's commitment to ensuring that human trafficking and slavery does not exist within its own business, but also provides how we will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship (and especially from within its supply chain).

Aspens Services Procurement Director oversees this area as a senior compliance officer (its Anti- Slavery and Human Trafficking Officer) and will take appropriate steps to ensure not only its own compliance but also that these requirements are followed by its suppliers, subcontractors and/or business partners (collectively by its "Suppliers") worldwide.

All Supplies are therefore required to adhere to this policy.

### **Our Business**

This statement covers Aspens Services Ltd, whose head office is in England.

Aspens Services Ltd is a catering and hospitality provider with over 4000 employees and operates more than 600 sites in the UK within education & business and industry. This statement outlines the measures we have taken to date and are continuing to take to ensure no slavery or human trafficking occurs in our business or in our supply chains.

### **Our Supply Chain**

Our supply chain includes the key product categories of Ambient, Frozen & Chilled Food, Fresh Produce, Dairy, Fresh Meat, Beer, Wine and Spirits, Equipment & Disposables. Aspens are currently reviewing and consolidating the supply chain in order to minimise the risk of non-compliance with the Modern Slavery Act 2015 (the 'Act').

## Definitions

**Human Trafficking:** the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

**Forced Labour:** all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

**Harmful Child Labour:** consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Aspens and our associated businesses are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our stance reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains. We also require our business partners to provide training to their staff, suppliers, and providers.

### **As part of our initiative to identify and mitigate risk:**

- where possible we build long standing relationships with suppliers and customers and make clear our expectations of business behaviour.
- at all our suppliers have either the mandatory Modern Slavery Act policy in place or a statement of assurance as well as ethical and 'no-child labour' policies regardless of turnover.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch, and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have an ethical policy in place systems to encourage the reporting of concerns and the protection of whistle blowers. Any breach of this Policy (including by a Supplier) can be reported (in confidence, if required) by contacting the company Procurement Director (in his capacity as Aspens Anti- Slavery and Human Trafficking Officer).
- To ensure all those in our supply chain comply with our values we have in place a supply chain compliance programme. This consists of structured contractual documentation (requiring suppliers to commit to complying with all relevant laws and regulations, including those relating to modern slavery and human trafficking) and a cyclical checking programme to ensure all parties uphold their commitments in line with our values.

## **Supplier adherence to our values:**

- We have a zero-tolerance stance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values
- complying with legislation and regulatory requirements, making suppliers and customers aware that we promote the requirements of the legislation.
- Considering modern slavery factors when making procurement decisions.
- The company will not source from suppliers where suppliers do not demonstrate their commitment to ensuring that slavery and human trafficking are not taking place in their own business or supply chains.
- The company will not work with any organisation or supplier that either has or is found to be knowingly involved within either human trafficking or modern slavery.
- If a Supplier is found in violation of this policy, we will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier (as above). It shall also take such other (remedial) steps as the Anti- Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.
- Suppliers will certify compliance with this Policy and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.
- Upon request, Suppliers must be able to demonstrate compliance with this Policy to the reasonable satisfaction. Aspens and/or it's associated businesses may perform periodic audits on this Policy and Suppliers are expected to fully co-operate with any such audit.
- Suppliers will certify compliance with this Policy and th ere adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.

## **Employees and agency workers**

We have zero tolerance in relation to all our employees regarding slavery and human trafficking which also applies to our dealings with staff agency companies. Aspens Services Ltd has strict HR policies and procedures which support the Act to protect against modern slavery and human trafficking. These include:

- carrying out pre-employment face to face interviews and checks of identification and right to work documentation. There may also be a requirement on certain contracts for employees to be vetted to a more stringent level, this will be client driven.

- Reference checks are required for all new employees. It is also a requirement that all employees can speak and understand the English language, so we can be confident employees will understand our policies and procedures, internal communications and will be able to ask for help should they require it.
- The business also insists that all employees have their own bank account for the payment of wages.
- The business carries out regular audits of its right to work and payroll information, which includes ad hoc site visits to ensure compliance. We provide various routes for employees to communicate with the business should bad practice be taking place and to allow people a confidential route to whistle blow.
- We actively support our supply chain suppliers in becoming and ensuring compliance with the Modern Slavery Act and continue to check annually our suppliers and their compliance through third party providers.

#### **Our safe systems in order to:**

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Confidential whistleblowing process available for all employees and agency workers.
- Monitor potential risk areas in our supply chains.

#### **Effectiveness**

Aspens Services Ltd has introduced the following KPI's to measure the performance of our anti-slavery actions:

- The number of Potential instances of modern slavery investigated within our business operations and supply chain.
- The number of employees receiving Modern Slavery Training

#### **Training**

Aspens Services Ltd recognises modern slavery is a crime and can take many forms, such as forced labour, servitude, compulsory labour and human trafficking. We remain committed to improving our practices to combat slavery and human trafficking.

Our Modern Slavery policy is communicated to all employees on our Company intranet to reinforce the policy. We ensure information is cascaded down the company, raising awareness of Modern Slavery at all levels of the business to all employees and new recruits are given specific training on what amounts to Modern Slavery, what our policy means and who to report any issues to. We encourage our employees to report any activity they believe to be unlawful and/or in breach of our policies and standards. Employees can inform the business of any concerns relating to potential risks or failures of our suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and Aspens Services Ltd.'s slavery and human trafficking statement for the financial year ending 31st September 2021.

A handwritten signature in black ink, appearing to read 'J. Roe', with a stylized flourish at the end.

John Roe  
Chief Executive Officer

Aspens Services Ltd

Date: July 2021