

Aspens Services Ltd. Modern Slavery Statement

Financial Year Ending 30th September 2025

This statement is issued pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Aspen Services Ltd. (Aspens) for the financial year ended 31 October 2025.

1. Our Commitment and Policy

Aspens Services Ltd. maintains a firm commitment to conducting all business operations and relationships ethically and with integrity. The company is dedicated to ensuring comprehensive transparency in its own activities and in the methods employed to combat modern slavery and human trafficking across its entire supply chain. These rigorous standards are unequivocally expected from all contractors, suppliers, and business partners.

The Board of Directors holds ultimate responsibility for ensuring this policy's compliance with our legal and ethical obligations, and for confirming adherence by all personnel and entities under our control.

2. Organisation Structure, Business, and Supply Chains

Aspens Services Ltd. is a provider of catering and food services, operating predominantly within the Education sector across England and Wales.

Our Supply Chains

Given the nature and complexity of our operations, our supply chains are extensive and varied. Aspen utilises the centralised procurement services of Added Value Enterprises Ltd (AVE) for all product and resource sourcing. Consequently, the primary management of upstream supply chain risks is executed through the comprehensive diligence and control mechanisms deployed by AVE.

The upstream supply chains, managed by AVE, include:

- Food and Ingredients: Sourcing of fresh produce, meat, dairy, and ambient goods, often originating from global markets through wholesalers.**
- Non-Food Goods: Procurement of uniforms, kitchen equipment, cleaning supplies, and packaging materials.**

3. Policies and Due Diligence Processes

Aspens operates several internal policies designed to ensure the ethical and transparent conduct of business operations. These include:

- **Ethical Sourcing Policy:** This policy details our commitment to fair labour practices, worker welfare, and environmental responsibility. This policy is formally mandated to and rigorously enforced through Added Value Enterprises Ltd (AVE) across the shared supplier base.
- **Whistleblowing Policy:** All employees, customers, and business partners are strongly encouraged to report concerns related to unethical conduct, including potential instances of modern slavery, without fear of retribution.
- **Code of Conduct:** This document clearly establishes the standards of behaviour required of all employees, emphasizing respect for human rights and strict adherence to all applicable laws.

4. Risk Assessment and Management

The key modern slavery risks have been identified by Aspens as follows, with the understanding that the overarching management of the supplier base is vested in AVE:

1. **Wholesaler and Tier 1 Supplier Management (Managed via AVE):** Risks are managed through AVE's direct relationship with wholesalers. The inherent risk remains concentrated in the raw material sourcing phases (e.g., agriculture and harvesting), where AVE's due diligence must ensure wholesaler compliance to mitigate the elevated vulnerability associated with migrant or informal labour.
2. **Contracted Services (Direct/Site Level):** This pertains to third-party cleaning, maintenance, and site-level temporary distribution services where casual or short-term labour is employed directly by Aspens or a specific site contractor.
3. **Procurement Oversight:** The necessity of ensuring that the processes and due diligence executed by AVE on the shared supplier base are robust, effective, and fully compliant with the Modern Slavery Act.

Due Diligence Steps Taken:

Throughout the reporting period, the following measures were undertaken:

- **Internal Collaboration with AVE:** Regular communication is maintained with the AVE Procurement team to review their due diligence activities, risk assessments, and audit schedules pertaining to key suppliers.
- **Contractual Clauses (via AVE):** All new commercial agreements negotiated by AVE incorporate specific clauses requiring suppliers to adhere to the Modern Slavery Act and grant AVE the right to audit their compliance on behalf of Aspens.
- **Direct Supplier Vetting:** For services contracted outside the AVE structure (e.g., site maintenance), suppliers are required to complete an ethical compliance

questionnaire, confirming their adherence to the Modern Slavery Act and the Aspens Ethical Sourcing Policy.

- **Annual Review:** A formal commitment has been made to conduct an annual review of the AVE supplier risk report, focusing on top-tier suppliers categorised by expenditure and geographical risk profile.

5. Key Performance Indicators (KPIs)

To effectively evaluate the efficacy of these measures, the following Key Performance Indicators are monitored, in close collaboration with AVE where applicable:

KPI	Target/Status
Supplier Acknowledgment (AVE Managed)	Attainment of sign-off on the Ethical Sourcing Policy by the top 50 shared suppliers through the AVE procurement process.
AVE Due Diligence Review	Completion of formal reviews/meetings with AVE Procurement to thoroughly discuss and validate supplier risk assessments and audit outcomes.
Training Completion	Achievement of 95% completion rate for modern slavery awareness training among relevant procurement, operational, and site management staff.
Breaches Identified	Maintenance of zero substantiated cases of modern slavery within our directly controlled operations.

6. Training and Awareness

To ensure an advanced level of understanding regarding the risks associated with modern slavery and human trafficking, comprehensive training is provided to relevant personnel, including the procurement team, Human Resources, and senior management. The training curriculum encompasses:

- Identification of risk factors and warning signs of modern slavery.
- Clarification of legal responsibilities under the Modern Slavery Act 2015.

- Procedures for escalating concerns utilising the internal Whistleblowing framework.

7. Approval

This statement has been formally approved by the Board of Directors on

Date: October 2025

and has been signed by Stuart Lenton, Managing Director on behalf of Aspens Services Ltd.

A handwritten signature in black ink, appearing to read 'Stuart Lenton', with a long horizontal stroke extending to the right.

Stuart Lenton

Managing Director

Aspens Services Ltd.