



A-SAFE

Modern Slavery and Human Trafficking Policy

Modern Slavery and Human Trafficking Policy and Review 2019

A-SAFE UK became subject to the requirements of the Modern Slavery Act 2015 (the Act) in the UK for the first time for the year ending 31 December 2019.

However, during the year we have been building on the work accomplished by A-SAFE in 2018.

We are pleased to state our commitment to developing and improving processes throughout our global organisation that prevent the use of slavery or human trafficking either in our own companies or across our supply chain.

Developments in 2018

During 2018, A-SAFE focused initially on its UK operations and supply chain. As a part of our standard audit process for new and existing suppliers, potential weaknesses in ethical controls are identified by our Purchasing team and action taken to address these concerns. A-SAFE take a collaborative approach with our suppliers as we wish to aid them to achieve success in improving ethical controls and in combating modern slavery where it is possible for us to do so. By means of this approach, a number of suppliers have already been assisted to improve their processes and prevent opportunities for modern slavery being allowed to develop. The willing cooperation of these suppliers has been welcomed.

A program to contact all existing suppliers has begun. They are requested to confirm the steps they are taking themselves to combat modern slavery and ensure that modern slavery is not taking place in their own supply chain. We are pleased that many of the responses show organisations are alive to the issues and are taking proactive steps to combat modern slavery. Responses are received, collated and acted upon as needed. An audit trail will be maintained so that progress can be monitored.

We can report that during 2018 no instances of slavery or human trafficking were reported within our organisation or have come to our attention in any of our supply chains.

Staff training

All new employees are required to undertake online Code of Conduct training and are encouraged to report any violations of the Code of which they become aware. In addition we have a Whistleblowing policy which encourages employees to contact the relevant individual or body if they believe any failure to comply with legal regulations or a criminal offence has been committed. A number of training sessions have taken place across the divisions operating in the UK to alert key employees to the requirements of the Act and to help them identify potential circumstances that could permit modern

slavery to take place. These key employees are encouraged to cascade the training down to other members of staff who may be in a better position to observe circumstances that could increase the risk of modern slavery occurring. Employees are encouraged to share their concerns with management who will take each report seriously.

Planned actions for 2019

In 2019 we will be continuing our program to contact all existing suppliers and audit their compliance with our ethical standards. We will be continuing training for employees, especially those whose job role enables them to observe the working conditions of our suppliers. We will also take all opportunities to learn from the experience of other organisations to continue to develop best practice across our own operations.