

SLAVERY & HUMAN TRAFFICKING

POLICY STATEMENT

In-line with the Modern Slavery Act 2015

Opening statement from senior management

Ashe is dedicated to preventing modern slavery and human trafficking from taking place within its business and supply chain and we place the same expectation on our suppliers.

Structure and supply chains

Ashe is a regional company which works within the construction sector and employs around 115 people in the UK. The following web link provides more information regarding the nature of our business www.asheconstruction.co.uk.

The nature of our business requires that we work in conjunction with a range of suppliers, sub-contractors, agencies, and professionals.

Ashe operates exclusively in the highly regulated construction sector within the UK. All work is carried out in accordance with UK Government tax regulations and the UK's health and safety regime. The directors believe that this significantly reduces the risk of contravention of the Modern Slavery Act 2015.

There are a number of circumstances that reduce the risk of slavery and human trafficking within our supply chains. These include:

- Our work is not seasonal and does not rely on large numbers of unskilled labour at specific times of the year.
- Our work is generally skilled and requires competent, capable skilled operatives who carry validated trade or professional qualifications.
- As a regional operator our sub-contractor supply chains are generally relatively short and use established and regular contractors, who also work exclusively within the regulated UK economy.
- Work on our sites is always monitored by our own employees allowing a high degree of control and visibility of our own work.
- The majority of our material supplies that are used on our sites are generally sourced through UK distributors or UK companies within our supply chain, allowing strong commercial controls to be applied to encourage compliance with the Modern Slavery Act 2015. Material sourced from outside the EU is rare and the isolated nature of this procurement allows bespoke controls in each instance.

As an established, owner managed, family business, our relationship with our employees allows a high degree of engagement between directors and all employees. These regular and open relationships allow the best environment to raise concerns of slavery and human trafficking should they occur.

Policies relating to slavery and human trafficking

The following policies exist within our organisation which demonstrate our opposition to modern slavery:

- Equal Opportunities and Dignity at Work
- Managing Diversity
- Foreign Nationals Policy

We ensure our suppliers are aware of our policies and encourage them to adopt the same high standards.

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Our company

Ashe will work to promote awareness amongst its employees of modern slavery and human trafficking within the UK construction industry. The company will ensure that their employee pay and conditions remain at a high standard, above those dictated by the Act. Any potential contravention will be dealt with seriously and investigated appropriately by the directors, as will any recommendations for improvement within the business. Any whistleblowing or complaint by an employee will be supported and investigated through our formal grievance procedure.

The directors believe that the risk of failing to comply with the Modern Slavery Act 2015 is low, because of the following measures:

- All employees are on full written conditions of employment that are standardised and checked for compliance with the Act.
- All employees are paid at or above the “Living Wage”.
- No casual labour is employed.
- Unpaid work experience or internships are regulated through a standardised risk assessment.
- Appropriate training of relevant staff will be carried out prior to the financial year end.

Within our subcontractor supply chain

Ashe will work to prevent modern slavery and human trafficking within our sub-contractor supply chains through reducing the risks and working to influence behaviours within our directly contracted sub-contractor organisations. Any failure to address these issues that results in a contravention of the Act, a possible contravention, or a perceived contravention of the Act that could impact the reputation of Ashe may be investigated and result in a variety of actions, up to and including removal from our supply chain.

Within the current financial year Ashe will undertake the following activities:

- A review and amendment of standard terms of engagement to incorporate the requirements of the Act and requirements of Ashe.
- Each order will remind subcontractors of their responsibilities to their supply chains and the implications to working with Ashe. It will also provide for a reporting structure for any infringement or potential infringement.
- Large companies caught by the Act will be expected to provide their slavery and human trafficking statements for our records and review.

The Construction Directors at Ashe are responsible for compliance with these requirements.

Within our material supplier supply chain

Ashe will work to prevent modern slavery and human trafficking within our material supply chains by reducing the risks and working to influence behaviours within our directly contracted supplier organisations. Any failure to address these issues that results in a contravention of the Act, a possible contravention, or a perceived contravention of the Act that could impact the reputation of Ashe may be investigated and result in a variety of actions, up to and including removal from our supply chain.

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Within the current financial year Ashe will undertake the following activities:

- A review and amendment of standard terms of supply to incorporate the requirements of the Act and requirements of Ashe
- Each order will remind them of their responsibilities to their supply chains and the implications to working with Ashe. It will also provide for a reporting structure for any infringement or potential infringement.
- Seeking copies of our suppliers' statements on slavery and human trafficking, which will be taken as evidence that the organisation is starting to address this important issue and that in the current year we can assume compliance with the Act.

The Construction Directors are responsible for compliance with these requirements.

Due diligence processes relating to slavery and human trafficking

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, we adopt the following due diligence procedures:

Our processes aim to:

- Identify, monitor and manage areas of potential risk in our business and supply chains
- Scrutinise any identified areas of risk within our business and supply chains
- Adopt a zero tolerance approach to slavery and human trafficking throughout the organisation and our supply chains
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

Risk and compliance

Within the current financial year we will carry out a risk assessment of key risks to contravention of the Act within our own businesses, our sub-contractor and material supply chain. This will identify the areas of concern and the mitigating acts that we will carry out this year and next to manage this risk as effectively as possible.

These risk assessments will be put together in conjunction with the senior employees as part of the training within our companies and will include those individuals who are responsible for procurement, management and control of our supply chains.

Within the risk assessments we will review the most appropriate form of whistleblowing to ensure that this is condoned and could be a useful way of ensuring compliance.

Success and effectiveness of our policies and processes

Within the current financial year directors will determine an appropriate set of benchmarks to ensure that slavery and human trafficking is not taking place in their businesses or supply chains and that, where there is an indication that there is a risk, it is investigated and managed. It is anticipated that this will require key performance indicators and we will investigate appropriately.

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Training

We ensure all employees are aware of the risks of modern slavery and human trafficking in our business and supply chains. Detailed below are examples of the training programmes we have in place to enable our employees to identify and report any potential breaches of the organisations anti-slavery and human trafficking policies.

- Company policy, procedures and best practice guides are available on our company network.
- Discussions at our Departmental Meetings.
- Training will be provided within the current financial year to all senior employees on the Act, its requirements and the support available. This may be repeated as required.

Further actions, approval and endorsement

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Introduction or review of new policies or procedures
- Consider appointing an independent body to carry out an annual audit of our business and supply chains to monitor how successful we have been in keeping slavery and human trafficking at bay.
- Modern Slavery Briefing notices to be displayed on our construction sites including the signs to spot potential victims.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Ashe's slavery and human trafficking statement for the financial year ending 31st December 2018.



Robin Blake
Group Chief Executive

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