



AS AQUASTAR

MECHANICAL, ELECTRICAL & PLUMBING

Devoted to Quality Works



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MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1. Purpose

The purpose of this Modern Slavery and Human Trafficking Policy is to affirm **AS AQUASTAR**'s commitment to ethical business practices and to ensure that slavery, forced labour, and human trafficking have no place in our operations or supply chains. This policy outlines our approach to identifying, preventing, and addressing modern slavery risks, in compliance with the UK Modern Slavery Act 2015 and other relevant regulations.

2. Scope

This policy applies to all employees, contractors, suppliers, partners, and any third parties working on behalf of AS AQUASTAR. It covers all aspects of our operations and supply chains, from procurement to project delivery, and applies to all locations where we operate.

3. Policy Statement

AS AQUASTAR is committed to:

- Operating a zero-tolerance approach to modern slavery and human trafficking in all its forms.
 - Ensuring that our business and supply chains are free from forced labour, exploitation, child labour, and any form of human trafficking.
 - Promoting ethical practices, transparency, and accountability in our operations and partnerships.
 - Complying with all relevant legislation, including the UK Modern Slavery Act 2015 and international standards on human rights.
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4. Definitions

4.1. Modern Slavery

- Modern slavery refers to situations where individuals are coerced, deceived, or forced into work against their will. It includes forced labour, bonded labour, child labour, human trafficking, and any other exploitation that deprives individuals of their freedom.

4.2. Human Trafficking

- Human trafficking involves recruiting, transporting, or harbouring individuals by means of threat, force, coercion, deception, or abuse for the purpose of exploitation.
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5. Responsibilities

5.1. Senior Management

- Lead the organization's efforts to combat modern slavery and promote ethical practices.

- Ensure that the Modern Slavery and Human Trafficking Policy is communicated, implemented, and reviewed regularly to maintain its effectiveness.

5.2. Compliance Officer

- A Compliance Officer will be appointed to oversee compliance with this policy, conduct risk assessments, investigate concerns, and monitor the implementation of anti-slavery measures.
- The Compliance Officer will maintain records of due diligence, supplier assessments, and any reported incidents related to modern slavery.

5.3. Employees, Contractors, and Partners

- Adhere to the Modern Slavery and Human Trafficking Policy and report any suspicions or concerns about unethical practices.
- Participate in awareness and training programs to stay informed about modern slavery risks and prevention measures.

6. Risk Assessment and Due Diligence

6.1. Risk Assessment

- Conduct regular risk assessments to identify potential areas of vulnerability to modern slavery and human trafficking within our operations and supply chains.
- Evaluate high-risk areas, including sectors, regions, and categories of workers that may be susceptible to exploitation.

6.2. Due Diligence

- Conduct due diligence on suppliers, contractors, and partners to assess their commitment to ethical practices and compliance with anti-slavery standards.
- All new suppliers and subcontractors must agree to AS AQUASTAR's Supplier Code of Conduct, which outlines our expectations regarding ethical behaviour, human rights, and labour practices.

6.3. Supply Chain Monitoring

- Monitor and review supplier compliance with anti-slavery requirements through regular audits, inspections, and assessments.
- Terminate relationships with suppliers or partners who fail to meet our ethical standards or are found to be involved in modern slavery practices.

7. Training and Awareness

7.1. Employee Training

- All employees, including managers and supervisors, must undergo mandatory training on modern slavery, human trafficking, and ethical labour practices.

- Training will cover how to identify signs of modern slavery, reporting mechanisms, and the consequences of non-compliance.

7.2. Supplier Awareness

- Provide suppliers, contractors, and partners with information and guidance on our anti-slavery expectations and standards.
 - Encourage suppliers to implement their own modern slavery policies and training initiatives to promote responsible labour practices.
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8. Reporting and Whistleblowing

8.1. Reporting Concerns

- All employees, contractors, and third parties are encouraged to report any suspicions or evidence of modern slavery or human trafficking within AS AQUASTAR or its supply chains.
- Reports can be made directly to a supervisor, manager, the Compliance Officer, or via a confidential whistleblowing hotline.

8.2. Whistleblower Protection

- AS AQUASTAR is committed to protecting whistleblowers from retaliation, victimization, or adverse treatment for raising genuine concerns in good faith.
 - All reports will be treated with confidentiality and investigated promptly and thoroughly.
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9. Monitoring and Compliance

9.1. Internal Audits

- Conduct regular internal audits to ensure compliance with the Modern Slavery and Human Trafficking Policy.
- Audits will evaluate the effectiveness of the policy, the implementation of risk assessments, supplier evaluations, and corrective actions taken.

9.2. Corrective Actions

- If instances of modern slavery or human trafficking are identified, immediate action will be taken to address the issue and protect affected individuals.
 - Corrective actions may include terminating supplier contracts, providing support to victims, and reporting incidents to relevant authorities.
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10. Supplier and Partner Engagement

10.1. Supplier Code of Conduct

- AS AQUASTAR requires all suppliers, subcontractors, and partners to adhere to a Supplier Code of Conduct that prohibits modern slavery, human trafficking, and unethical labour practices.
- The Supplier Code of Conduct will outline expectations regarding fair wages, safe working conditions, and the prevention of exploitation.

10.2. Collaboration with Partners

- Collaborate with industry partners, non-governmental organizations (NGOs), and regulatory bodies to share best practices, resources, and information on combating modern slavery.

11. Continuous Improvement

11.1. Policy Review

- This Modern Slavery and Human Trafficking Policy will be reviewed annually or when significant changes occur in relevant laws, regulations, or industry standards.
- Updates will be made to reflect best practices, new developments, and feedback from employees and stakeholders.

11.2. Performance Evaluation

- Measure and report on our progress in addressing modern slavery risks and implementing effective controls.
- Set clear targets for continuous improvement in our anti-slavery efforts.

11.3. Feedback and Improvement

- Encourage feedback from employees, clients, suppliers, and stakeholders to identify areas for improvement.
- Use lessons learned to enhance our practices and strengthen our commitment to preventing modern slavery.

12. Conclusion

AS AQUASTAR is committed to operating in a manner that respects human rights and ensures that modern slavery and human trafficking have no place in our business or supply chains. By implementing this policy, we aim to protect vulnerable individuals, maintain ethical standards, and promote a culture of integrity, responsibility, and accountability.

Approved by: *Abel C.*
Date: 24/09/2024
Review Cycle: Annually

