

Access Group Solutions (AGS) is committed to preventing modern slavery occurring within the business, infiltrating its service and supply chains, or infiltrating through any other business relationship.

The policy applies to all persons working for or on behalf of AGS, in any capacity, including employees, directors, service providers, contractors, consultants and any other third-party representatives.

Access Group Solutions expects that all those who have or those who seek any relationship with AGS to familiarise themselves with this policy and to act in a way that is consistent with our values.

Access Group Solutions will only partner with organisations who comply with this policy.

## **What Do We Mean by Modern Slavery?**

Modern slavery can take many forms; it is a complex and multi-faceted problem. The Modern Slavery Act 2018 covers four key criminal activities:

Slavery: where ownership is exercised over an individual

Servitude: involves the obligation to provide service imposed by coercion

Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty

Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the MSA, include, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.
- All forms of modern slavery have in common, the deprivation of a person's liberty by another to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

# Modern Slavery Policy

- Tackling modern slavery requires everybody to play a part and remain vigilant.

## **How Access Group Solutions seeks to Embed the Anti-Slavery Policy in Practice**

To underpin the commitments laid out in this policy, Access Group Solutions aims to implement the following measures by end of October 2020:

- Access Group Solutions will conduct or commission risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery, so efforts can be focused on the areas that are most 'at risk'
- Where appropriate, as informed by the risk assessment, Access Group Solutions will engage directly with new suppliers in respect of the Anti-Slavery Policy to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.
- Our contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy.
- We also make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.

## **Responsibility for This Policy**

The Managing Director has overall responsibility for this policy and in ensuring that Access Group Solutions complies with all its legal and ethical obligations.

The General Manager will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All Managers are responsible for ensuring that their teams comply with the provisions of this policy in the day to day performance of their roles.

## **Communication and Employee Awareness Training**

Line Managers will ensure that relevant personnel receive adequate training on this policy and any supporting processes applicable to their role.

## **Breaches of This Policy**

The breach of this policy by an employee or manager of AGS may lead to disciplinary action being taken in accordance with the Business' Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

If any part of this policy is unclear, clarification should be sought from the People and Culture Team.

## **Status of This Policy**

This Anti-Slavery Policy will be reviewed by the Leadership Team on a regular basis. Access Group Solutions may update the notice from time to time to reflect legal and operational requirements.



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Date: 29/11/2021

**Fred Khoury**  
**Managing Director**