



MODERN SLAVERY STATEMENT 2021

This statement sets out that Astus Group Ltd (**Astus**) is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Astus has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This statements applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the policy

Astus has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Astus has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. All staff working for Astus are required to avoid any activity that might lead to, or suggest, a breach of these policies and must notify their line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

These include:

1. **Anti-slavery policy.** This policy sets out the organisation's stance of modern slavery and explains how employees can identify any instances of this and where they can go for help.
1. **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK (or any other territory) checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear or reprisals.
3. **Code of business conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our Suppliers

Astus operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses related to modern slavery, along with checking the modern slavery statement registry.

Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. We may terminate the contract at any time should any instances of modern slavery come to light.

Training & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place in our supply chain.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Approval of this statement

This statement was updated and approved by the Board of Directors on 8th April 2021.

Name: David Jones

Position: COO, Astus Group Ltd

Signature:

David Jones

Dated: 8th April 2021