

## 1 Scope

- 1.1 We have a responsibility to prevent and recognise slavery and human trafficking within all our business activities and supply chains. In particular, Section 54 of the Modern Slavery Act 2015 makes it clear that we have a responsibility to ensure our supply chains are open and accountable.
- 1.2 This policy applies to all colleagues and volunteers. It outlines our approach to recognising and minimising the risk of modern slavery and human trafficking within our workforce, in our communities, and throughout our supply chains.
- 1.3 Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation, including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting. More details can be found in Appendix A to this policy.
- 1.4 Modern slavery takes place across the world. It is often associated with people trafficking across national borders but can happen within local communities too and often in plain sight. Victims of modern slavery can be any age, gender, nationality, and ethnicity.

## 2 Policy Statement

- 2.1 We have a zero-tolerance approach to modern slavery and human trafficking within our organisation. We will never knowingly support or deal with any business whose operations involve slavery or human trafficking in any way.
- 2.2 Our Safeguarding Adults at Risk Policy, and Safeguarding Children Policy should be followed if anyone becomes suspicious, or aware of potential slavery or human trafficking. The incident should be recorded on any relevant internal system such as Assure and reported to the Modern Slavery Helpline on 0800 0121 700 or online at: [File a report \(modernslaveryhelpline.org\)](https://www.modernslaveryhelpline.org).
- 2.3 We regularly check our recruitment process controls and checks are sufficiently robust to minimise the risk of modern slavery within our workforce. This includes appropriate checks to ensure that potential employees are legally entitled to work in the UK and that all colleagues have written contracts of employment. We ensure we have a suitable process for people to report their concerns, such as through our “Speak Up” process. Wellbeing options will also be available to colleagues offering multiple options for them to voice any concerns and get help.
- 2.4 Specific Anti-Modern Slavery and human trafficking training will be provided to everyone in the business. More in-depth training will be provided to those working in parts of the business where modern slavery is more likely to take place, such as supply chain management, procurement, and housebuilding activities.

- 2.5 We will:
- Ask suppliers/bidders to confirm their agreement to follow our Anti-Modern Slavery and Human Trafficking policy.
  - Make use of standard terms and conditions so suppliers must comply with all applicable laws and regulations including the Modern Slavery Act 2015. This refers to their own and their subcontractors' supply chains.
  - Make use of procurement frameworks, where suppliers have to set out their response to anti-modern slavery to participate.
- 2.6 Colleagues who manage contracts and/or supply chains should routinely make sure the Modern Slavery Act is being followed. They should also take practical steps to gain assurance that our suppliers and contractors are minimising the risk of modern slavery within their supply chains or business activities. Risks and mitigations will be considered when they enter into a contract. This will vary depending on the nature of the contract.
- 2.7 Colleagues must consider whether there are any practical opportunities to recognise or prevent modern slavery within their business area and take steps to reduce the risk. In higher-risk areas such as procurement, supply chain management and housebuilding activities, an action plan containing all the necessary mitigations will be required.
- 2.8 We will publish our Anti-Modern Slavery Statement on an annual basis, in line with Section 54 of the Modern Slavery Act 2015 (or any relevant updated legislation) and approved by the necessary operational panel and our Boards.

### 3 Monitoring and Review

- 3.1 All suppliers and contractors will confirm compliance with this policy by either submitting a compliant response to a tender or accepting the terms and conditions within a purchase order.
- 3.2 Compliance with mandatory training requirements is to be monitored every quarter.
- 3.3 Within six months of this policy becoming effective, the action plans referred to in 2.5 will be prepared for review by the policy owner, policy author, and the Risk and Compliance Team where appropriate. They will consider whether practical steps are being taken to reduce the risk of modern slavery and human trafficking.
- 3.4 The effectiveness of this policy will be monitored, and the embedding of the policy scrutinised after 12 months by the *Corporate Performance & People Panel*
- 3.5 This policy will be reviewed every three years unless business need, regulation or legislation prompts an early review.

### 4 Related Policies and Procedures

- 4.1 Safeguarding Children Policy
- 4.2 Safeguarding Adults at Risk Policy
- 4.3 Procurement Policy
- 4.4 Diversity and Inclusion Policy
- 4.5 Gifts, Hospitality and Anti-Bribery Policy

- 4.6 Anti-Money Laundering Policy
- 4.7 Speak Up Policy
- 4.8 Group Health and Safety Policy
- 4.9 Recruitment and Selection Policy and Procedures
- 4.10 The Aster Way

| 5 Governance                        |  |                        |            |
|-------------------------------------|--|------------------------|------------|
| <b>Effective From:</b>              | 05/09/2023                               | <b>Expires:</b>        | 04/09/2026 |
| <b>Policy Owner:</b>                | Director of Procurement                  |                        |            |
| <b>Policy Author:</b>               | Head of Business and Market Intelligence |                        |            |
| <b>Approved by:</b>                 | <i>Aster Group Ltd Board</i>             |                        |            |
| <b>Delegation Matrix Reference:</b> | R026                                     | <b>Version Number:</b> | 4.00       |

#### Spotting the signs of slavery or human trafficking:

1. Someone is in slavery if they are:
  - forced to work due to psychological or physical threat;
  - owned or controlled by an 'employer', usually through psychological or physical abuse or the threat of abuse;
  - dehumanised, treated as a commodity or bought and sold as 'property';
  - physically constrained or has restrictions placed on their freedom of movement.
  
2. The following definitions are encompassed within the term 'modern slavery' for under the Modern Slavery Act 2015. These are:
  - 'Slavery' is where ownership is exercised over a person;
  - 'Servitude' involves the obligation to provide services imposed by coercion;
  - 'Sourced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily;
  - 'Human trafficking' concerns arranging or facilitating the travel of another to exploit them.
  
3. Examples of Modern Slavery include:
  - **Forced Labour**, where someone is forced to work under the threat of violence and for no pay. These slaves are treated as property and exploited to create a product for commercial sale.
  - **Bonded Labour**, where individuals are compelled to work to repay a debt and unable to leave until the debt is repaid. (This is the most common form of enslavement in the world).
  - **Domestic Servitude**, where people working in private homes are forced or coerced into serving and/or fraudulently convinced that they have no option to leave.
  - **Sex Trafficking**, where women, men or children are forced into the commercial sex industry and held against their will by force, fraud or coercion.
  - **Child Labour**, where a child is subject to any of the forms of enslavement mentioned above.
  - **Forced Marriage**, where anyone is forced to marry another without their consent or against their will.