
Introduction

Modern slavery is a crime and an indefensible violation of fundamental human rights. It takes many forms such as slavery, servitude, forced or compulsory labour and human trafficking, all of which deprive a person's liberty to exploit them for personal or commercial gain. ACS recognises as a business we have a moral and social responsibility and as such take a zero-tolerance stance to modern slavery in all forms.

We are committed to preventing slavery and human trafficking in our corporate activities and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within any of our supply chains.

We only seek to secure relationships and partnerships with suppliers who conduct their business operations and buying practices in line with the Fair Trade Principles and the Modern Slavery Act 2015.

Our Business

Our primary business is the stocking and delivery of business supplies, including office products, electronic computer supplies and consumables, furniture and managed print solutions. We have a customer portfolio consisting of many corporate and public sector organisations.

Background

We are committed to ensuring ACS is transparent in our approach to tackling modern day slavery throughout our supply chains. We expect the same high standards from all our contractors, suppliers, reseller customers and other business partners. As part of our agreement procedures we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to ensure their own supply chain follow the same high standards.

We check the profile of every new supplier and require each to complete a questionnaire, which we then assess. We only engage suppliers when we are confident there are no conflicts with the standards set out in our ethical policies.

Responsibility for the Policy

The Board of Directors have overall responsibility for ensuring this Policy complies with our legal and ethical obligations and all those under our control also comply with it.

The Commercial Director, Harry Stevenson, has primary and day to day responsibility for implementing this Policy, monitoring its use and effectiveness. He will deal with any queries relating to the Policy, auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with his Policy and are given sufficient and regular training on the Policy, current legislation and the issue of modern slavery in supply chains.

Compliance

The following applies to all persons working for ACS or on our behalf in any capacity, including employees, directors, officers, agency workers, volunteers, apprentices, agents, contractors, external consultants, third party representatives and business partners.

Anti-Slavery & Human Trafficking

Policy & Processes



This Policy should be read in conjunction with the following policies; Corporate Social Responsibility, Sustainability, Compliance Non-conformity and Whistleblowing.

You must ensure that you read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for ACS or under our control. It is an expectation that you will avoid any activity that could cause, lead to, or suggest a breach of this Policy.

You must notify your manager, as soon as possible, if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future. Following such notification, your manager is then responsible to raise the concern with the Commercial Director, Harry Stevenson.

If you are unsure about a particular act, the treatment of workers or their working conditions within any tier of our supply chain or part of our business that constitutes some form of modern slavery, immediately raise this with your line manager at your earliest possible convenience.

It is our intention for openness to be encouraged and therefore we will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

As supported by our Whistleblowing Policy, we are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith. This includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe you have suffered any such treatment, you should inform Harry Stevenson the Commercial Director immediately. If the matter is not remedied and you are an employee, you should raise it formally using our Grievance Procedure. This can be found in the Staff Handbook or through our internal intranet system or from the Human Resources Department.

Communication of the Policy

All new employees undergo a formal induction process. Training on this Policy and the risk our business faces from modern slavery in its supply chain, forms part of that process, and also the mandatory training all employees receive on an annual basis.

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.

Reference is made to our Policy and approach to modern slavery in our company Terms and Conditions.

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.

This policy statement is approved by our Commercial Director, Harry Stevenson, who is responsible for anti-slavery and human trafficking matters.

Harry is contactable via: harry.stevenson@acsgroup.co.uk

