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## 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 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 have adopted stringent standards and implemented strong policies which we expect our supply chain to comply with. 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 agreements 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.

To ensure compliance we thoroughly check the profile of every new supplier and require each to complete a Supply Chain Questionnaire, which we then assess. For those organisations who pass our evaluation we then obtain a signed agreement that confirms their statements are true and only engage suppliers when we are confident there are no conflicts with the standards set out in our own policies. By ensuring conformity with our strict standards we can provide our customers with confidence that throughout all areas of our supply chain, there is a zero tolerance for modern slavery and no human trafficking is carried out. Also, our goods have been produced lawfully through fair and honest dealings without exploiting the individuals who made them and in decent working conditions.

We re-evaluate our supply chain quarterly and annually through supplier reviews and KPI monitoring, this ensures our original selection criteria is still being maintained throughout their agreement with ACS.

Any high risk businesses are identified and closely monitored, this allows ACS to continually assess their procedures and working practices, then implement any improvements, where required. We work closely with these companies and continually report on the percentage of suppliers with whom we have communicated, to ensure compliance with our company policies and codes of conduct. We have developed training programmes to make certain of ongoing compliance with our stringent modern slavery standards.

## 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.

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Management at all levels are responsible for ensuring those reporting to them understand and comply with the Policy and given regular training on this Policy, current legislation and the problem 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 supply chain partners.

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

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 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 the treatment of workers or their working conditions within any tier of our supply chain or a 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 this is carried out by our Human Resources Manager, Kellie Hand, it includes training on our Anti-Slavery and Human Trafficking Policy, as well as the risk our business faces from modern slavery being present in our supply chain. Every 12 month's we assess which employees may require more in-depth training.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and prior to ACS entering into a contract, this is reinforced as appropriate thereafter.

A copy of this Policy is available to view on our company website and internal intranet system called 'The Hub'.

## Breaches of this Policy

Any employee, contractor, supplier, reseller customer and other business partner who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with individuals and organisations working on our behalf if they breach this Policy.