

Modern Slavery Policy

Policy title	Modern Slavery Policy
Version	2.1
Policy owner	HR Manager
Approved by	Board of Directors
Date approved	25 August 2026
Review frequency	Annually, or earlier if required (see section 12)
Next review due	July 2027
Applies to	All employees, workers, agency staff and contractors of AUK Supplies Ltd, and all suppliers and business partners
Related documents	Whistleblowing Policy; Grievance Procedure; Anti-Bribery and Corruption Policy; Recruitment Policy; Procurement and Supplier Code of Conduct; Employee Code of Conduct; annual Modern Slavery and Human Trafficking Statement

1. Purpose

This policy sets out AUK Supplies Ltd's approach to preventing modern slavery and human trafficking in our business and supply chains, and the responsibilities of our people and business partners in upholding it. It supports our annual Modern Slavery and Human Trafficking Statement, which is published voluntarily in the spirit of section 54 of the Modern Slavery Act 2015 and reports on the steps we have taken each financial year.

2. Scope

This policy applies to all persons working for or on behalf of AUK Supplies Ltd in any capacity, including employees,



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directors, officers, agency workers, contractors and consultants, and to our suppliers and business partners. AUK Supplies Ltd is based at 7 Cavalier Road, Heathfield Industrial Estate, Newton Abbot, TQ12 6TQ. We distribute cleaning and hygiene products, manufacture hand care products and distribute ironmongery and furniture fitting products across the UK. Our supply chain principally comprises manufacturers and wholesalers, mainly from the UK and Europe, with some products originating from Asia.

3. Definitions

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including 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. The International Labour Organization (ILO) has identified 11 indicators of forced labour, which our training and due diligence draw upon:

- abuse of vulnerability;
- deception;
- restriction of movement;
- isolation;
- physical and sexual violence;
- intimidation and threats;
- retention of identity documents;
- withholding of wages;
- debt bondage;
- abusive working and living conditions;
- excessive overtime.

4. Policy statement

AUK Supplies Ltd adopts a zero-tolerance approach to modern slavery and human trafficking, and to all forms of corruption and bribery directly or indirectly associated with these criminal acts. 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 our supply chains. We expect the same high standards from all of our contractors, suppliers and business partners, and we will not knowingly associate with any



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business that is in breach of the Modern Slavery Act 2015 or engaged in slavery or human trafficking.

Provisions of this Policy:

- We comply with all applicable local and national employment laws in every jurisdiction in which we or our supply chain operate.
- Workers are free to terminate their employment with reasonable notice, without penalty.
- We uphold freedom of movement for all workers and do not restrict access to rest, food, water or sanitation facilities.
- We prohibit any threat of violence, harassment or intimidation against workers.
- We prohibit the charging of recruitment fees to workers by us or on our behalf and require the same of our suppliers and labour providers.
- We prohibit compulsory or excessive overtime beyond what is lawful and voluntary.
- We prohibit child labour in any part of our business or supply chain.
- We prohibit discrimination of any kind in recruitment, employment or working conditions.
- We prohibit the confiscation, destruction or withholding of workers' original identification or travel documents.
- We provide access to remedy, compensation and justice for victims of modern slavery, including through our reporting and grievance channels (see Section 9).

We engage agency or temporary labour only through reputable agencies that demonstrate compliance with applicable employment and labour laws, carry out right-to-work checks on all employees, and confirm that no worker has paid a recruitment fee to secure their employment with us.

5. Responsibilities

- The Managing Director has overall responsibility for this policy and for ensuring AUK Supplies Ltd complies with its legal and ethical obligations.
- The Board of Directors approves this policy and the annual Modern Slavery and Human Trafficking Statement, and reviews performance against our key performance indicators annually.
- The HR Manager is responsible for the day-to-day operation of this policy, including training, right-to-work compliance, agency labour verification, and maintaining the concerns log.
- The Sales Director is responsible for supplier due diligence, including the supplier approval process, self-assessment questionnaires and supplier audits.



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- Managers must ensure their teams understand this policy and must escalate any concern raised to them without delay.
- All employees and workers must read and comply with this policy and report any suspected instance of modern slavery.

6. Risk assessment

We assess the risk of modern slavery across our operations and supply chain by reference to sector, geography, workforce profile and the nature of goods and services supplied. We consider our own direct operations to be low risk, as our workforce is directly employed, UK-based and subject to right-to-work checks, or agency labour subject to verification of compliance with employment law. We recognise that risk is higher in our extended supply chain, particularly products manufactured overseas, raw materials, logistics, cleaning and agency labour, and we prioritise our due diligence accordingly. Risk assessments are reviewed annually and when we engage significant new suppliers.

As part of strengthening our risk assessment, we will introduce desk-based research — using resources such as the Responsible Sourcing Tool — to identify higher-risk countries, commodities and sourcing routes in our supply chain, and to help prioritise which suppliers receive enhanced due diligence, self-assessment questionnaires or audits under Section 7.

7. Due diligence and supplier compliance

We consider modern slavery risk at each stage of our procurement process, not only at supplier onboarding. This includes assessing whether the prices we are quoted are realistic given the labour, material and compliance costs a supplier would reasonably incur — treating unusually low prices as a potential red flag for exploitation rather than solely a commercial advantage. We are working to formalise this consideration within our tendering, price negotiation and contract renewal processes, in addition to the pre-supply checks set out below.

To identify, prevent and mitigate the risk of modern slavery, we will:

- require new suppliers to confirm compliance with the Modern Slavery Act 2015 and, where applicable, provide a copy of their own statement or policy, before commencement of supply;
- include anti-slavery and human trafficking obligations in our standard terms and supplier contracts, with the right to terminate for breach;
- screen key and high-risk suppliers through a self-assessment questionnaire covering labour standards, sourcing and subcontracting;



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- conduct audits of key suppliers, and of the agencies supplying labour to us, to verify compliance with our policies and standards;
- work towards a supply chain compliance programme aligned to the principles of the Ethical Trading Initiative (ETI) Base Code
- encourage suppliers with a total turnover in excess of £36 million to publish a modern slavery statement of their own;
- operate a zero recruitment fee policy: no worker, whether employed directly or through an agency, will pay a fee to secure work with us or in our supply chain — where such fees are identified, we require they be repaid to the worker;
- require labour providers and high-risk suppliers to disclose any deductions made from workers' wages for accommodation, transport, healthcare or other services, and to confirm such deductions do not leave workers unable to meet their basic needs or freely resign;
- include recruitment and labour-provider due diligence within our self-assessment questionnaire and audit programme, covering recruitment fees, wage deductions and the risk of debt bondage.

We recognise that our own purchasing practices can affect the risk of modern slavery in our supply chain. In practice, the vast majority of our suppliers are paid within 30 days of invoice, we use stock planning software to provide suppliers with reasonable notice of orders, and we aim to offer suppliers continuity and stability in our trading relationships. We will review our purchasing practices, including payment terms, forecasting, order volumes and contract stability, with reference to guidance such as the Ethical Trading Initiative's Guide to Buying Responsibly.

Where issues are identified, our first response is to work with the supplier to remediate them; we will terminate the relationship where a supplier is unwilling or unable to address serious concerns.

8. Training and awareness

All employees receive annual modern slavery training covering how to identify the warning signs of modern slavery, including the ILO's 11 indicators of forced labour set out in section 3, and how to escalate concerns. Training also covers good business practices, supporting tools and key contacts for modern slavery concerns; clear guidance on how to report suspected instances; and the ethical behaviours expected of all employees.

We make this policy available to our suppliers and require them, through our standard terms and self-assessment questionnaire, to make this policy or their own equivalent policy available and communicated to their workers. Where appropriate, we work with suppliers to promote awareness



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of anti-slavery standards among workers in our supply chain, including through supplier briefings, contractual terms or inclusion in supplier codes of conduct.

We provide targeted briefing or training materials on this policy to our high-risk suppliers, in addition to making the policy available to all suppliers, to help ensure consistent understanding of the standards we expect throughout our supply chain.

9. Reporting concerns

Employees, workers, suppliers and other third parties are encouraged to report any concerns about modern slavery or unethical labour practices connected to our business or supply chains. Concerns can be raised with one of the Directors, in confidence under our Whistleblowing Policy (including anonymously), or through our grievance procedure.

We will acknowledge any report of suspected modern slavery within five working days of receipt and, where an investigation is required, will open that investigation within ten working days. We will keep the person who raised the concern informed of progress and, where appropriate, the outcome. All grievances and whistleblowing reports relating to suspected modern slavery will be recorded and monitored, and reported to the Board as part of our key performance indicators. No one will suffer detriment for raising a genuine concern. We will investigate all reports and take appropriate remedial action, including notifying the relevant authorities where required.

Where a supplier identifies and reports suspected modern slavery in its own operations, cooperates with the relevant authorities and works with us to implement corrective action, we will not automatically terminate or suspend trade with that supplier on the basis of that report alone. Our priority in such cases is remediation: supporting the safeguarding of victims and their access to remedy, compensation and justice, and the supplier's implementation of corrective measures, consistent with our response times set out above. We reserve the right to terminate the relationship where a supplier is found to be complicit, is uncooperative, or is unwilling or unable to remediate identified concerns.

10. Measuring effectiveness

We monitor the effectiveness of this policy through key performance indicators, including:

- the proportion of key suppliers who have confirmed compliance with the Modern Slavery Act 2015 or signed our Supplier Code of Conduct;
- the proportion of all staff who have completed modern slavery awareness training (target: 100% of employees);
- the number of supplier audits completed each year and any issues identified and remediated;



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- the number of concerns raised, including through our grievance and whistleblowing procedures, and the outcome of any investigations.

Performance against these indicators is reported to the Board annually and published in our annual Modern Slavery and Human Trafficking Statement.

11. Breaches of this policy

Any employee who breaches this policy may face disciplinary action, up to and including dismissal for gross misconduct. We may terminate our relationship with suppliers, contractors or other business partners who breach this policy or who are unwilling or unable to remediate identified concerns.

12. Review

This policy is owned by the HR Manager and reviewed annually, with any material changes approved by the Board of Directors. An earlier review will be carried out where there is a significant change in legislation or guidance, a substantiated modern slavery concern, or a material change to our operations or supply chain. The annual review is scheduled to align with the preparation of our Modern Slavery and Human Trafficking Statement each July.



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