

Introduction

This statement sets out Asterol Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2016 to 31 March 2017.

As part of Asterol's business in the Healthcare sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Asterol Limited and its subsidiaries, in its business providing quality managed equipment services for the Healthcare sector both within the NHS and privately.

Countries of operation and supply

The organisation currently operates in the following countries:

- The United Kingdom of Great Britain and Northern Ireland; and
- The Republic of Ireland

Periodically the company assesses whether or not particular activities or countries it is considering entering are high risk in relation to slavery or human trafficking, this is undertaken as a joint process with all applicable departments represented.

High-risk activities

Currently the organisation does not consider itself to have any high risk activities.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** - The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Employee code of conduct** - The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct** - The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to

- demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** - The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

Performance indicators

The organisation has reviewed its key performance indicators in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring staff potentially working in countries where the risk is greater than our norm to have completed training on modern slavery;
- developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains on an on-going basis, whereby the organisation evaluates all existing suppliers.

Training

The organisation requires staff working in areas outside the current arena to complete training on modern slavery. The organisation's modern slavery training covers (noting that it will be tailored to the specific country/region concerned):

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised general awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline (www.modernslaveryhelpline.org).

Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually.

Director's signature:



Director's name: **Stephen Tuddenham**

Date: **27th January 2017**