

Anti-slavery, human trafficking and illegal working policy

About this policy

Aspiration is committed to ensuring that there is no modern slavery, human trafficking or illegal workers in our business or our supply chains. This Statement affirms our intention to act ethically in our business relationships.

Modern slavery

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in the Company supply chains or in any part of our business.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as 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. 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 any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Supply chain overview

We require our supply chain to confirm they are trading in accordance with the Modern Slavery Act 2015. We expect them to adopt our policies in this regard and offer evidence to support how they operate.

Our PQQ Documentation will be updated in accordance with this new legislation and incorporated into the terms and conditions of our Sub-Contract and Purchase Orders.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Illegal workers

Aspiration Group carry out appropriate VISA, Passport and DOB checks to ensure all employees are entitled to work in the UK in accordance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006.

Should a non-UK resident apply to work with us, as identified by pre-employment screening questions, a copy of their work visa and passport would be required. All necessary checks would then be made to ensure the person had the right to work in the UK and they have no immigration restrictions that prevent them from doing the work in question.

Should a potential employees' right to work (RTW) in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment.

All related verified documentation is retained for a minimum of 2 years after the individual has ceased employment with 2CT Consultants.

Review of RTW is carried out on a yearly basis.

Compliance with this policy

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 chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you should raise it with your line manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Training

You will receive training to help them understand the requirements of The Modern Slavery Act 2015, how to monitor our supply chain and identify potential problems, as necessary.

Our Policies in relation to the Modern Slavery Act 2015

- Corporate and Social Responsibility Policy
- Anti harassment and Bullying Policy
- Whistleblowing Policy
- Safeguarding Policy
- Valuing Diversity and Dignity at Work Policy