Modern Slavery and Human Trafficking Policy
P301

Policy Statement

It is Ace Connections Policy to conduct its business in a fair, open and honest manner and to take a zero-tolerance approach to all slavery, servitude, forced or compulsory labour (including child labour) and human trafficking. To achieve this Ace Connections is committed to:

- acting professionally, fairly and with integrity in all business dealings and relationships wherever we operate.
- prohibiting all forms of Modern Slavery, all of which are a crime and a violation of fundamental human rights and have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- compliance with all laws relevant to countering modern slavery including the Modern Slavery Act 2015, approved Codes of Practice and industry recognised guidelines.
- ensuring, so far as it is reasonably practicable to do so, that contracts contain provisions allowing for automatic termination for breach of the Modern Slavery Act 2015.
- investigating thoroughly any actual or suspected breach of this Policy, or the spirit of this Policy.
- verifying every new team members right to work in the UK upon the commencement of their employment. With regards subcontracted individuals, verification is sought from the company supplying them as to their similar commitment and internal process.
- implementing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our business or in any of our supply chains.
- consulting with team members and providing appropriate information, instruction and training to ensure all team members are aware of their Modern Slavery Act 2015 obligations.
- ensuring that enough resource is allocated as required for the implementation of this Policy.

This policy statement applies to all individuals or companies working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agencies and agency workers, seconded workers, volunteers, interns, agents, sub-contractors, external consultants, third-party representatives and business partners.

This document will be made available to all Ace Connections employees and contractors. A global communication will be issued to all notifying them of amendments to this document should they be necessary.

Compliance with this document will be monitored by Ace Connections Auditors and Assessing Officer, a training session will be undertaken with team members if deemed necessary, based on the findings of that monitoring.

This policy has been written and approved by the Senior Directors as signed below, it will be reviewed with amendments below.

Approved by:

Andrew Butcher
Director
ACE Connections

Chris King
Director
ACE Connections

Document reviews

Date	Rev No	Changes / Purpose	Reviewer	Approver
01/12/2021	1	Initial issue	C King	A Butcher
12/12/2022	2	Annual review – added subcontractor verification of process for right to work checking	C King	A Butcher
18/12/2023	3	Annual Review – no change	C King	A Butcher
11/08/2025	4	Reviewed in conjunction with Peninsula HR guidance	C King	A Butcher
26/08/2026	5	Annual review – no change	C King	A Butcher