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Complied by: Alex Mountain
Reviewed by: Peter King

Revision	Date	Change(s)
1	17/01/2022	Document reviewed

Summary

AccessTec is committed to the prevention of modern slavery in relation to the Modern Slavery Act 2015*. The scope of this procedure applies to all purchases by AccessTec, this procedure is applicable to suppliers and/or sub-contractors, who provide products or services that are deemed to be critical to the products and services provided by AccessTec.

*<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

AccessTec is committed to the highest level of ethical standards and sets high standards of impartiality, integrity, and objectivity in relation to the management of its activities. As such, we adopt a zero tolerance to modern slavery, human trafficking, and all forms of corruption and bribery directly and indirectly associated with these criminal acts. We fully support the government's objectives to eradicate modern slavery and human trafficking. Further, we encourage all organisations we engage with to influence their supply chains by improving transparency and accountability.

Supply chain and business due diligence

Our procurement activities predominantly take place in the UK; and our contractors and suppliers are predominantly UK and EU based.

There are four likely purchase type requirements identified, with examples given in parentheses:

1. Critical Process Vendors, Production (service vendors who provide test and inspection, calibration, assembly, fabrication, custom design products or software)
2. Distributors or Raw Materials, Production (production items such as packaging materials, packing labels, software, computers or other off-the shelf products)
3. Distributors/Vendors, Non-Production (non-production items such as office supplies)
4. Partner Subcontractors, Production (vendors that help us support our client projects)

Our employees occasionally stay in UK hotels when conducting business away from the office. We occasionally procure meeting and conference venues to support our general business activities and these are selected to ensure good value for money. We note that the hotel and hospitality trade recognise the risk of modern slavery within their sector and a Stop Slavery Hotel Industry Network is being developed by the industry.

Expectation and encouragement

We expect all partners, organisations whom we work with and other companies we engage with to ensure their goods, materials and labour-related supply chains are:

- Fully comply with the Modern Slavery Act 2015;
- Transparent, accountable, and auditable;
- Free from ethical ambiguities.

Management responsibility and general awareness

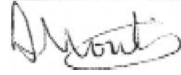
AccessTec will:

- record our ongoing compliance with this policy;
- continue to raise awareness of this published statement by re-notifying organisations other companies with which we regularly engage;
- remind employees of our legal and moral obligations under the Act.

Consequences

AccessTec takes any breach of this policy extremely seriously. Suppliers who are found to have or be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this policy will be liable to have any supply agreement, arrangement or other contract with AccessTec terminated immediately, without compensation.

If a supplier is found in violation of this policy, we will take prompt action which may include terminating any supply agreement, arrangement or other contract with that Supplier. It shall also take such other (remedial) steps as the Anti- Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

Complied by:	Alex Mountain - Director	17/01/2022	
Authorised by:	Peter King - Director	17/01/2022	