



Anti-Slavery and Human Trafficking Policy

1. About this policy

Ashford Colour Press has a zero-tolerance approach to modern slavery and human trafficking. Ashford Colour Press is committed to acting ethically and with integrity in all its business dealings, by implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the business or within its supply chains.

The Anti-Slavery and Human Trafficking Policy applies to all persons working for Ashford Colour Press or on its behalf, in any capacity, including employees at all levels, directors, officers, contractors, consultants, third-party representatives and business partners.

Ashford Colour Press meets the disclosure obligations under the Modern Slavery Act, by publishing a group slavery and human trafficking statement for the financial year, on Ashford Colour Press website. Ashford Colour Press requires the same high standards from all its contractors, suppliers and other business partners, ensuring specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, whether adults or children throughout the extended supply chain.

2. Responsibility for the policy

The board of directors has overall responsibility for the Anti-Slavery and Human Trafficking Policy by ensuring compliance with Ashford Colour Press's legal and ethical obligations.

Ashford Colour Press's procurement teams, through supplier selection and supplier reviews, monitor the day to day responsibility against the supply chain that supports Ashford Colour Press and, through assessing internal control systems and developing on boarding procedures to ensure they are effective in countering modern slavery, are required to avoid any actions that might lead to, or suggest, a breach of this policy.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this

Anti-Slavery and Human Trafficking Policy and are given training where appropriate.

3. Compliance with the policy

The prevention, detection and reporting of modern slavery in any part of Ashford Colour Press or the Ashford Colour Press supply chains is the responsibility of all those working for Ashford Colour Press.

4. Types of modern slavery

Forced or involuntary labour

No one shall be subject to any form of slavery, servitude, forced, compulsory, bonded indentured or prison labour. All work must be voluntary and anyone shall have the freedom to terminate their employment or engagement at any time subject to them complying with any contractual obligations which they are required to observe, provided such obligations are legal.

This policy is made available to relevant interested parties externally on our website and internally through training and awareness programmes.

Humane Treatment and anti-harassment and bullying

Ashford Colour Press is committed to providing a working environment, that is free from any form of inhumane treatment and providing an environment free from harassment and bullying, to ensure that all staff are treated, and treat others, with dignity and respect. The use or threat of physical or sexual violence, harassment and intimidation against someone, his or her family, or close associates, is strictly prohibited.

Freedom of movement and personal freedom

Workers' freedom of movement shall not be unreasonably restricted.

Working hours

Workers shall not be forced to work more than the maximum number of hours per week which is set by national law unless that national law allows otherwise.

Individuals shall not be made to work overtime under the threat of unlawful penalty or denunciation to authorities and shall not be made to work overtime as a disciplinary measure, or for failure to meet production quotas.

Wages and benefits

Clear and transparent information shall be provided about hours worked, rates of pay and the calculation of legal deductions.

All workers shall be paid at least the minimum wage required by applicable laws (if any) and shall be provided with any benefits which are available and permitted by law subject to the individual meeting all criteria to be entitled to such benefits.

All individuals are to retain full and complete control over their earnings. Wage payments shall be made at regular intervals and paid directly to individuals, in accordance with their contract of employment and national law. Such payments shall not be delayed, deferred, or withheld unless it is permissible by law to do so.

Only deductions, advances and loans authorised by national law are permitted and shall only be taken with the consent and understanding of individuals. Wage deductions must not be used as a disciplinary measure, or to keep individuals tied to Ashford Colour Press or another or to their jobs. Individuals shall not be held in debt bondage or forced to work to pay off a debt.

Document retention

Confiscating or withholding identity documents or other valuable items, including work permits and travel documentation (e.g. passports, ID cards), bank cards and similar documents is strictly prohibited. The retention of personal documents shall not be used to bind someone to work for Ashford Colour Press or to restrict their freedom of movement.

Persons who work for Ashford Colour Press in other capacities other than as employees

The person is required to comply with any contracts applicable under the Ashford Colour Press Procurement and Corporate Responsibility Procedure. From time to time Ashford Colour Press may request completion of questionnaires or supplier assessment forms that will need to be returned and completed in line with validation of the Anti-Slavery and Human Trafficking Policy.

Ashford Colour Press supply chain is required to co-operate fully with any audit which Ashford Colour Press may, at its absolute discretion, undertake from time to time. This may include Ashford Colour Press undertaking a site visit to your premises or meeting with your employees and/or suppliers to verify certain information.

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Recruitment

Individuals recruiting for and on behalf of Ashford Colour Press must observe Ashford Colour Press recruitment policy in place.

Where Ashford Colour Press recruits through an external intermediary, the persons dealing with the intermediary agency shall ensure, that the intermediary has specific policies in place to ensure that the relationships are managed in a way which mitigates a potential risk of modern slavery.

Ashford Colour Press mandate that individuals shall not be charged any illegal recruitment fees which would mean that such individuals could fall into forced or bonded labour.

5. How to raise concern

Ashford Colour Press encourages concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier to be raised at the earliest possible stage.

If you are an Ashford Colour Press employee, the matter must be notified immediately to your line manager if you believe or suspect that a breach of this policy has occurred, or may occur in the future, or reported in accordance with our Whistleblowing Policy.

If you are not an employee and you believe or suspect that a conflict with this policy or a breach of this policy has occurred, or may occur in the future you should notify your direct contact within the business, or report it in accordance with our Whistleblowing Policy.

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 forms of modern slavery, the matter should be raised directly with the Procurement and Contracts Manager at Ashford Colour Press.

6. Communicating awareness of this policy

Training for awareness on the Anti-Slavery and Human Trafficking Policy will be provided. Ashford Colour Press's zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners in Ashford Colour Press Standard Terms and Conditions and any Ashford Colour Press specified contracts as a mandated requirement, with no exclusions.

7. Failure of compliance

Ashford Colour Press's responses to modern slavery shall ensure the safety and welfare of the potential victims of paramount importance.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Ashford Colour Press may terminate the business relationship with other individuals and organisations where it has been identified that the Anti-Slavery and Human Trafficking Policy has been breached. If appropriate, and within the UK, the case will be reported to the police.

For cases outside of the UK the most appropriate response may be to:

- Engage with local NGO's, industry bodies, trade unions
- Contact the local government and law enforcement bodies

Rob Hutcheson

R. Hutcheson

Managing Director

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