



Modern Day Slavery Policy

The Modern Slavery Act 2015 requires any commercial business, with over £36m global turnover and operating in the UK, to produce a slavery and human trafficking statement each year. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.). Hundreds of thousands of men, women and children are subject to human trafficking every year. There are currently estimated to be 21 million people working as forced labour in the world (source: Global Slavery Index) with 13,000 people living in the UK being forced to work at slaves (source: Home Office).

As a small business, producing a statement is not a legal requirement for Compressed Air Solutions Ltd. However, in order to help reduce slavery and human trafficking, this policy sets out the steps that Compressed Air Solutions has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

As a business, Compressed Air Solutions sells, installs, services and repairs compressed air systems and ancillary equipment in the UK. Our customer base consists of businesses that operate within the manufacturing and construction industry. As a business, we have a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

The Directors of Compressed Air Solutions commit to the following actions:

- *We comply with all applicable wage and hour laws and regulations and provide legally mandated benefits*
- *We do not and will not employ workers younger than the local, legally required minimum age.*
- *We do not and will not use forced, bonded, indentured or slave labour.*
- *We do not and will not violate basic human rights of life, liberty and security.*
- *The company does not and will not condone any harsh or inhumane treatment (including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees).*

As a small business, high risk areas identified to CAS as a business are through the additional use of labour and when sub-contracting work.

In order to mitigate the risk of modern day slavery within these areas, Compressed Air Solutions will also undertake the following:

- In line with company policy, any sub-contractor used by Compressed Air Solutions is required to complete a questionnaire prior to commencing any work. This questionnaire has been amended in August 2016 to include eligibility to work checks for their employees and any sub contractors or agency staff that they themselves may use to ensure slavery risks are mitigated further down the labour supply chain.

- The use of agency staff will be for short term/ temporary to permanent contracts where eligibility to work in the UK has been checked by the agency and evidence provided to CAS management (evidence will be those documents as identified in government guidance for eligibility checks)

We also operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner:

- 1. Recruitment procedures: Our recruitment procedures include conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.*
- 2. Whistle Blowing: We have a whistle blowing procedure so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.*
- 3. Sub-Contractor Policy: Our assessment of subcontractors includes eligibility to work in the UK checks.*
- 4. Corporate Social Responsibility: details the minimum standards which the Directors expect from all employees, in their internal and external dealings with all stakeholders including colleagues, customers, suppliers, communities and society as a whole.*

All suppliers that provide goods and services to Compressed Air Solutions are authorised by the company Directors in accordance with our Quality Management System.

Our stakeholders (employees, customers, public etc) can also help reduce modern day slavery by helping to identify and report any concerns to the relevant parties. Examples that may cause concern include the following:

- A worker may not be in control of their own movements if they are not possession/cannot provide their own passport or travel documentation (evidence of eligibility to work)*
- A worker may not be in control of their income if their wages are going into a different named account or multiple persons wages are being paid into the same account.*
- Workers who become agitated when asked about their families/life in general may be scared about revealing their true situation.*
- A worker may be being held against their will if they are being transported to and from work by the same person every day.*
- Workers may be being held against their will if they are living at the same address used by many others.*
- Workers being forced to work against their will may be attending work every day wearing the same clothes, looking malnourished, tired and with poor personal hygiene.*

Should any of Compressed Air Solution stakeholders have any concerns regarding modern day slavery they can contact the Modern Slavery Helpline on 0800 0121 700 or the Non Emergency Police number 101.

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain when:

- No reports are received from employees, customers, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

All employees will be provided with information, instruction and training on modern day slavery and the requirements of this policy. This policy will be reviewed on an annual basis and disseminated to all employees electronically. Copies of this policy will be made available to any interested parties as requested.

A handwritten signature in black ink, appearing to read 'M Scott', with a large, stylized flourish above the name.

Mark Scott, Managing Director

14th October 2021