

# Modern Slavery Policy

## January 2025

This policy is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Ashleigh (Scotland) Ltd 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.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Ashleigh (Scotland) Ltd has 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.

### **Our business**

Ashleigh (Scotland) Ltd is a Private Limited construction company, formed in 2001 and registered in Scotland. We have offices in Prestwick and Dumfries, and employ over 140 members of staff. We deliver projects predominantly in Central and South West Scotland, from Social and Private Housing, Healthcare, Community Buildings, Leisure Facilities, Flatted Developments, Education, Commercial, Student Accommodation, Refurbishments and Extensions.

### **Our policies**

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

1. Recruitment policy. We operate a robust recruitment policy, including 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. Whistleblowing policy. We operate a whistleblowing policy 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. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### **Our suppliers**

Ashleigh (Scotland) Ltd operates a control of sub-contractors document and maintains an approved supply chain. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light

### **Training**

Ashleigh (Scotland) Ltd operates a Training Policy and regularly conduct's training for our procurement teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### **Our performance indicators**

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 if:

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

**Signed:**



**Date:** January 2025

**David Smith**  
**Managing Director**