

# Modern Slavery Act Transparency Statement

ASHI Group Limited and associated Companies operates in the UK serving the retail, public sector, and commercial markets. The Group manufactures and installs a wide range of home improvement products designed to improve the aesthetics, security, and energy efficiency of properties. The Group has an employed workforce of approximately 1400 people. The Head Office and manufacturing plants are based in Norwich, and the Group has a network of sales outlets and installation depots across the UK mainland.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps being taken by the Group to understand all potential modern slavery risks to its business and to ensure that modern slavery or human trafficking is not taking place in any of its supply chains, and in any part of its own business.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Group 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 any part of our business or our supply chains.

Below are set out policies and practices in place during the 2023/24 financial year and actions the Group are committed to taking during 2024/25.

## Group Policies

The Group have several policies and practices in place to ensure that the Group are conducting business in an ethical and transparent manner. These include:

### - Modern Slavery

The Modern Slavery Policy sets out its stance on modern slavery and explains how the Group will handle such issues. It also includes guidance as to how to identify and report any suspected issues and where to find further information or guidance.

### - Recruitment

The Group operates a robust recruitment and selection process. This includes ensuring that appropriate identity checks are carried out in accordance with our Prevention of Illegal Working Policy, to establish that all new employees are eligible to work in the UK.

### - Agency Workers

The Group only source agency workers from reputable UK employment agencies who comply with the Agency Worker Regulations and carry out the appropriate identity checks to establish that workers are eligible to work in the UK.

## - Pay

The Group complies with National Minimum Wage and National Living Wage. All employees are paid directly into a personal bank or building society account in their name.

## - Whistleblowing

The Group encourage all its employees and any other individual working for or on behalf the Company to report concerns about suspected malpractice or wrongdoing, whether related to activities within the Company or to its suppliers or sub-contractors.

The Group's Whistleblowing Policy provides guidance as to how to raise concerns. It also provides reassurance to any individual raising a concern that this will be taken seriously, investigated appropriately, that their confidentiality will be respected and that they are able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

Further guidance and support are available from the Whistleblowing Officer and an independent confidential helpline.

# Supply Chain

The Group has a complex supply chain with a variety of commercial relationships with third parties and this is a key area of focus for Company's anti-slavery activities.

All suppliers and sub-contractors of the Group will have access to this Statement and the Modern Slavery Policy and will always be made aware of the standards of behaviour the Group expects from them.

The Procurement Team completed the following activities during 2023/24:

- Industry standard training in relation to the Modern Slavery Act;
- Risk assessment of suppliers and sub-contractors in the Group's top 80% of annual spend;
- Assess any identified risks with existing and new suppliers or sub-contractors and take appropriate action in accordance with the principles of the Modern Slavery Act.
- Has ensured the requirements designated under BES 6001 - Responsible Sourcing, have been met.

The Procurement Team will commence the following activities during 2024/25:

- Maintain industry standard training in relation to the Modern Slavery Act;
- Risk assessment of suppliers and sub-contractors in the Groups top 80% of annual spend;
- Assess any identified risks with existing and new suppliers or sub-contractors and take appropriate action in accordance with the principles of the Modern Slavery Act.
- Maintain processes and procedures that meet the requirements of BES6001

This statement was approved by the Board of Directors.