

## Modern Slavery Policy

### 1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Advanced Total Supplies Ltd (“the Company”) has taken to prevent modern slavery and human trafficking in its business and supply chains.

While the Company’s turnover is currently below £36 million, we voluntarily align with the requirements of the Act in line with best practice and the expectations of our public sector clients, including NHS organisations, local authorities, and housing providers.

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#### (a) Our Organisation, Business and Supply Chains

Advanced Total Supplies Ltd is a UK-based supplier of **domestic appliances, furniture, beds and bedding**, primarily serving public sector and third-sector organisations including NHS bodies, local authorities, charities and housing associations.

##### Structure and Operations

- UK-registered company with centralised management
- Core functions include procurement, supplier management, and distribution

##### Supply Chains

Our supply chain includes:

- UK-based distributors and wholesalers
- Manufacturers of domestic appliances
- Furniture and bedding manufacturers
- Textile producers (for bedding products)
- Logistics and warehousing providers

Some products are sourced from **international manufacturing markets**, including regions where there is an increased risk of labour exploitation, particularly in:

- Furniture manufacturing
- Textile and bedding production
- Electrical appliance assembly

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#### (b) Policies in Relation to Slavery and Human Trafficking

We operate a **zero-tolerance approach** to modern slavery and human trafficking.

Our internal framework includes:

- Modern Slavery and Human Trafficking Policy
- Supplier Code of Conduct
- Whistleblowing Policy
- Ethical Procurement Policy

These policies:

- Prohibit forced labour, bonded labour, and child labour
- Require suppliers to uphold internationally recognised labour standards
- Ensure workers are treated fairly and legally

All employees, contractors, and suppliers are required to adhere to these standards.

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### **(c) Due Diligence Processes**

We apply proportionate and risk-based due diligence across our supply chains.

#### **Supplier Onboarding**

All suppliers must:

- Confirm compliance with the Modern Slavery Act 2015
- Provide a modern slavery statement where applicable
- Accept our Supplier Code of Conduct

#### **Risk-Based Due Diligence**

Enhanced checks are carried out for:

- Suppliers in high-risk countries
- Suppliers in furniture and textile manufacturing
- Low-cost, high-volume goods

#### **Ongoing Monitoring**

- Periodic supplier reviews
- Requests for updated compliance documentation
- Right to request evidence of labour standards and ethical sourcing

## Internal Employment Controls

- Right-to-work checks for all employees
  - Direct employment contracts
  - Compliance with UK wage, working time and employment legislation
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## (d) Risk Assessment and Management

We recognise that our sector carries **inherent modern slavery risks**, particularly in manufacturing and textiles.

### Key Risk Areas

- Overseas manufacturing of appliances and furniture
- Textile production for bedding (including cotton supply chains)
- Multi-tier supply chains with limited visibility beyond Tier 1
- Use of low-cost labour markets

### Mitigation Measures

- Risk-based supplier segmentation
- Preference for UK/EU suppliers where feasible
- Supplier declarations and contractual obligations
- Ability to terminate supplier relationships for non-compliance
- Ongoing development of supply chain transparency

We continuously review and refine our risk assessment processes.

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## (e) Effectiveness and Performance Indicators

We measure our effectiveness using the following KPIs:

- % of suppliers assessed for modern slavery risk
- % of key suppliers providing modern slavery statements
- Number of high-risk suppliers subject to enhanced due diligence
- Number of staff trained annually
- Number of reported concerns or incidents

## **Current Position**

- No confirmed cases of modern slavery identified
  - Increasing coverage of supplier compliance checks year-on-year
  - Continued improvement in supply chain visibility
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## **(f) Training and Capacity Building**

We provide training to ensure staff understand modern slavery risks relevant to our sector.

### **Training Includes:**

- **All staff:** Awareness of modern slavery and reporting mechanisms
- **Procurement and management teams:**
  - Supply chain risk identification
  - Sector-specific risks (furniture, appliances, textiles)
  - Supplier due diligence procedures

Training is:

- Delivered at induction
  - Refreshed periodically
  - Updated to reflect evolving risks and guidance
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## **Governance and Approval**

An appointed Anti-Slavery Officer is responsible for implementation and monitoring of this statement and associated policies, reporting to senior management.

This statement has been approved by the Board of Directors and will be reviewed annually.

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### **Signed:**

Charlie Cleverly

Operations Director

**Date:** 12/01/2026