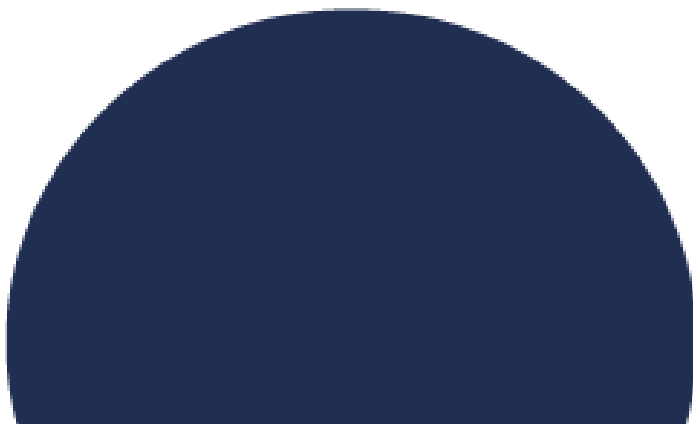




# Slavery and Human Trafficking



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## 1. Introduction

At ANS we aspire to be the UK's leading Cloud Service Provider of choice. We aim to ensure that the services we provide embed excellence into both our own and our customer's business, whilst maximising the Return on Investment and creating business opportunities.

We always aspire to be recognised as being a trustworthy, open, honest, and ethical organisation. Therefore ANS is committed to supporting an ethical approach to procurement and environmental sustainability in the supply chain.

ANS understands its legal requirements and obligations around its conduct regarding the protection of human and labour rights; including combatting modern slavery in our supply chains.

## 2. Scope

In order to support that commitment ANS will continue to commit to the continual improvement of all our supplier procedures and to the review and due diligence of our supplier base across this financial year 2022 – 2023.

This review includes:

Documented procedural and policy assessment  
Risk Assessment  
Supplier Assessment  
Supplier Diligence Questionnaires  
Internal training program (as required)  
Expanded CSR review

ANS have currently deployed the following policies (available on request)

- Anti-Bribery and Corruption Policy
- Equal Opportunities Policy
- Health and Safety Policy
- Raising a Concern Policy

## 3. Certification

ANS hold the following externally verified ISO Certification:

ISO 9001 Quality Management System  
ISO 27001 Information Security Management System  
ISO 27017 Data Security in the Cloud  
ISO 27018 Personal Data Security in the Cloud  
ISO 14001 Environmental Management System  
ISO 22301 Business Continuity Management System  
ISO 20000 Service Management System  
Cyber Essentials

## 4. Approach

This policy sets out the steps ANS has taken and will continue to take to ensure slavery and human trafficking does not take place in any part of its business. ANS has a zero tolerance approach to slavery and human trafficking and this policy has been produced pursuant to Section 54 of the Modern Slavery Act 2015. ANS expects its suppliers and their supply chains to adopt all reasonable and practical steps to comply with the Modern Slavery Act 2015.

This policy does not form part of any employee's contract of employment so may be amended from time to time.

## 5. Responsibility for this policy

The Board of ANS has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

The CEO has day to day responsibility for implementing this policy and monitoring its effectiveness in the prevention of slavery and human trafficking.

ANS encourages all of its employees, consultants, workers and contractors to report any concerns they have about slavery and/or human trafficking affecting the business, even if they turn out to be mistaken.

## 6. Steps for the prevention of modern slavery

ANS uses the following key performance indicators to measure how effective ANS's policies are in ensuring slavery and human trafficking is not taking place in any part of our business:

- \* Use of suppliers who themselves have in place ethical codes of conduct and often these are of a contractual nature.
- \* Carrying out due diligence where appropriate on suppliers.
- \* We regularly review our policies, codes of conduct and our working practices to show commitment.

We consider regularly the level of risk of slavery and human trafficking pose to ANS, its suppliers, contractors and business partners and given the nature of the companies in our supply chain, we consider this risk is very low.

All suppliers, contractors and other business partners will also be made aware of ANS's zero tolerance approach to modern slavery and will be expected to adopt the same approach.

A handwritten signature in black ink, appearing to read 'Richard Thompson'.

Richard Thompson Chief Executive Officer