



Slavery and Human Trafficking

Contents

1. Introduction	3
2. Scope	3
3. Approach	3
4. Responsibility for this policy	4
5. Steps for the prevention of modern slavery	4

1. Introduction

ANS Group is a 750+ team of technology specialists and business experts, specialising in Managed Services and providing solutions to a broad spectrum of clients. ANS pride themselves on their ability to provide Cloud, Security, Data and AI solutions. 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, anti-slavery and human trafficking, 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 the review and due diligence of our supplier base across this financial year.

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. 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.

We ensure compliance with the Modern Slavery Act 2015 by:

- Communicating our policy to employees, suppliers, customers and other stakeholders.
- Making the above aware of our zero-tolerance policy towards modern slavery and human trafficking.
- Ensuring the fundamental rights and freedoms of people are respected.
- Setting clear expectations of our supply chain and managing it effectively.
- Not knowingly supporting or dealing with any business or individual involved in slavery or human trafficking.
- Taking prompt action where a breach/potential breach in compliance is suspected or has been identified.
- Communicating with the Authorities in the above situation, where and as necessary.
- Training our employees. Training covers this Policy and its application in the workplace and is refreshed at regular intervals. In doing so, we build understanding and capacity of our employees to identify potential policy breaches.
- Having clear reporting protocols in place. Our employees should contact the Head of Information Security & Compliance, or in their absence, the ANS Compliance Team – should they have concerns about any issue or suspicion of modern slavery in any part of the company's business or in its supply chain.
- Thorough application of this Policy.

4. 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.

5. Steps for the prevention of modern slavery

ANS uses the following key performance indicators to measure how effective ANS's policies are and in ensuring slavery and human trafficking is not taking place in any part of our business or supply chain, ANS continues to prove effective and efficient in relation to all KPI's outlined below and this is continually monitored:

- * 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 via ANS supplier due diligence forms which all suppliers complete on initial recruitment and annual refresher.
- * 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 via the completion of a risk assessment on both ANS and our suppliers, due to the nature of our business and our suppliers, we consider this risk as 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