

# **Modern Slavery Policy**

Alliance Star Oxford Ltd

#### 1. Introduction

Alliance Star Oxford Ltd is committed to ensuring that modern slavery, human trafficking, forced labour, and exploitation have no place in our operations or supply chain. We recognize the importance of respecting human rights and are dedicated to adhering to the highest ethical standards in everything we do. This Modern Slavery Policy outlines our commitment to combating modern slavery and the steps we take to ensure compliance with relevant legislation, including the UK Modern Slavery Act 2015.

### 2. Our Commitment to Combating Modern Slavery

The Company commits to:

- Ensuring transparency in all our business dealings and relationships.
- Preventing modern slavery and human trafficking from occurring in our operations and supply chain.
- Regularly assessing and monitoring our practices and those of our suppliers to identify and mitigate the risks of modern slavery.
- Taking swift and appropriate action where any risk or violation is identified.

We expect the same high standards from all our suppliers, contractors, and business partners.

# 3. Organization Representative(s)

The responsibility for ensuring the effectiveness of this policy and the compliance of the Company lies with:

- Manager Director Oversees the overall strategy and policy implementation.
- **Operation Manager**: The designated individual(s) responsible for:

- Monitoring compliance with this policy.
- Conducting regular assessments of modern slavery risks in the Company's operations.
- o Handling reports or concerns related to modern slavery.
- Engaging with suppliers to ensure adherence to our standards.

All employees are expected to cooperate with the Operational Manager and other relevant personnel in the implementation of this policy.

### 4. Standards for Suppliers

Alliance Star Oxford Ltd is committed to working only with suppliers that share our commitment to ethical business practices. We expect all our suppliers to adhere to the following standards:

- **Prohibition of Forced Labour**: Suppliers must ensure that no form of forced, bonded, or involuntary labour is used in their operations.
- Fair Wages and Working Conditions: Suppliers must provide fair wages and maintain safe, healthy working conditions.
- Compliance with Local Laws: Suppliers must comply with all relevant labour laws in the countries they operate, including regulations related to working hours, child labour, and health and safety.
- Supply Chain Transparency: Suppliers must maintain transparency in their operations and provide information on their own supply chains upon request to help identify potential risks of modern slavery.

Failure to meet these standards may result in the termination of a supplier relationship.

### 5. Involvement and Engagement from the Workforce

To effectively combat modern slavery, we involve our workforce at all levels and encourage an open culture where any concerns about unethical behaviour can be reported without fear of retaliation. Employees are encouraged to:

- Report any concerns about modern slavery, human trafficking, or other unethical behaviour they encounter.
- Cooperate with any investigations or audits conducted by the Company.

The Company will not tolerate retaliation or discrimination against employees who raise concerns about modern slavery in good faith.

## 6. Training the Workforce

To ensure that employees understand and can identify modern slavery risks, we will provide:

- Mandatory training for all employees on modern slavery and human trafficking awareness. This will help them understand how to recognize signs of modern slavery and how to report concerns.
- **Specialized training** for employees involved in procurement, supply chain management, or other roles where modern slavery risks are higher.
- Regular refresher courses to maintain awareness and keep up to date with any changes in legislation or company practices.

#### 7. Procedures on Modern Slavery

We have implemented the following procedures to prevent, identify, and address any instances of modern slavery in our operations or supply chain:

- Risk Assessment: Regular assessments are conducted to identify the parts of our business and supply chains where there is a risk of modern slavery and human trafficking.
- Due Diligence: The Company conducts due diligence on new suppliers and contractors
  to ensure they comply with our standards regarding modern slavery. This includes
  reviewing their practices, conducting site visits where necessary, and requiring
  certifications of compliance.
- Reporting Mechanism: Any employee, contractor, or third party who has concerns about potential modern slavery practices can report them through the Company's confidential whistleblowing procedure or directly to the Modern Slavery Compliance Officer.
- **Investigations**: All reports of modern slavery are taken seriously. The Company will investigate any claims thoroughly and, if necessary, take corrective action, including terminating relationships with non-compliant suppliers or contractors.
- **Monitoring and Auditing**: The Company will conduct regular audits of suppliers and business partners to ensure ongoing compliance with modern slavery standards.

### 8. Policy Review

This Modern Slavery Policy will be reviewed annually or as required to reflect any changes in the law, industry standards, or the Company's operations. The review will be conducted by the **Manager Director** in collaboration with Operatives.

Any updates to the policy will be communicated to all employees, suppliers, and contractors.

#### 9. Conclusion

Alliance Star Oxford Ltd takes its responsibility to combat modern slavery seriously. We expect our employees, suppliers, and business partners to uphold the highest standards of integrity and to work together with us to eliminate modern slavery in all its forms.

By maintaining these practices, we aim to ensure that all individuals involved in our business and supply chain are treated with dignity and respect.

Effective Date: 14/12/2024 Next Review Date: 13/12/2025

Approved by:

Board of Directors, Alliance Star Oxford Ltd Signature: Marina de Lima

Date: 14/12/2024