



Modern slavery statement

As a small business turning over less than £36M a year, Ascot Finishers is not obliged under the Modern Slavery Act 2015 to produce a “slavery and human trafficking statement”. However, we recognise that we are supplying goods and services to a number of customers who do have to produce statements and comply with the act and therefore in response to several requests we have decided to voluntarily produce our own statement as a means of managing these requests and providing a level of assurance to our customers.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Ascot Finishers Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Ascot Finishers Ltd 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 the business or our supply chain.

Our business

Our business operates in the UK only. We apply paints and pre-treatments to various metal and composite parts for Aerospace, Defense, Medical and general industrial markets. We also own a Paint Distribution Company, Military and Aerospace Coatings Ltd, who act primarily as a wet paint distributor for NVSC, Italy. In total we employ 20-30 people. We purchase material from a small amount of UK suppliers and one foreign based supplier.

Our high risk areas

Senior management have considered all aspects of our business and believe we have no high risk areas. The vast majority of our purchase transactions are with large well-known companies. We do, however, buy services periodically from a number of suppliers who are small and may decide not to produce or are unable to produce a voluntary slavery and human trafficking statement and associated policies.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation’s stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. We operate a robust recruitment checks, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our suppliers

Ascot Finishers Ltd operates and maintains an approved/preferred supplier list. Military and Aerospace Coatings Ltd only distributes paint from an approved/preferred supplier list. We conduct due diligence on all suppliers before allowing them to become an approved/preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery where possible and relevant on site audit. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, we ask all our suppliers to confirm that they:

1. They have taken steps to identify and eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. That for UK suppliers that they pay their employees at least the national minimum wage
4. For international suppliers that they pay their employees any prevailing minimum wage applicable within their country of operations

Training

We conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 14th November 2017

Name (Director)

Signature

Date



14/11/2017