



# ASSEMBLY CONTRACTS LIMITED

## Modern Slavery and Human Trafficking Policy

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| <b>Document owner</b> | Lee Williams - Operations Director / nominated Modern Slavery Lead                                |
| <b>Revision</b>       | 3                                                                                                 |
| <b>Effective date</b> | 24 August 2026                                                                                    |
| <b>Review cycle</b>   | At least annually and after significant change or incident                                        |
| <b>Applies to</b>     | Assembly Contracts Limited, its workers, agency labour, contractors, suppliers and subcontractors |

Controlled document: printed or downloaded copies are uncontrolled unless marked otherwise. This policy should be read with the Supplier Code of Conduct, Whistleblowing Policy, Recruitment Policy, Equality and Dignity at Work Policy, Health and Safety Policy and relevant procurement procedures.

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## 1. Purpose and commitment

Assembly Contracts Limited is committed to respecting human rights and to preventing modern slavery and human trafficking in its own operations and supply chains. We will not tolerate slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, or any other form of exploitation connected with our business.

We recognise that modern slavery can be hidden in otherwise legitimate businesses and may affect people employed directly, through labour providers, or several tiers away in a global supply chain. We will therefore use a risk-based, proportionate and continuous-improvement approach: understand our operations and supply chains, identify risks, prevent and mitigate harm, investigate concerns, and support victim-centred remediation where harm occurs.

**We will not knowingly benefit from modern slavery and will not retaliate against anyone who raises a concern in good faith. Commercial pressure, production deadlines or customer requirements do not justify unsafe, coercive or unlawful labour practices.**

## 2. Scope

This policy applies to all Assembly Contracts Limited activities and locations, including PCB assembly, component procurement, storage, logistics, rework, testing, repair, facilities management and waste handling. It applies to:

- employees, directors and officers, whether permanent, temporary, part-time or agency workers;
- contractors, consultants, visitors and other people working on our behalf;
- suppliers of PCBs, components, solder and other production materials, packaging, equipment and services;
- subcontractors, recruitment agencies, logistics providers, cleaners, security providers, maintenance providers and waste contractors; and
- any subsidiary, joint venture or other entity covered by an applicable group policy or contract.



Where a customer, law or contract imposes a higher standard, the higher standard applies provided it is lawful and does not conflict with this policy. Suppliers are expected to apply equivalent requirements throughout their own supply chains.

### 3. What modern slavery means

For this policy, modern slavery means situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception or abuse of power. It includes slavery, servitude, forced or compulsory labour and human trafficking.

Examples include:

- requiring work through threats, violence, intimidation, deception or withholding wages;
- charging workers recruitment or placement fees that create debt or dependency;
- confiscating passports, identity documents, phones or work permits, or restricting freedom of movement;
- preventing a worker from leaving employment or accommodation, or imposing unreasonable deposits or penalties;
- using child labour or a person who has been trafficked; and
- using excessive or compulsory overtime, unlawful deductions or abusive accommodation to control workers.

### 4. Our business and risk profile

Assembly Contracts Limited is a PCB assembly company. Our activities may involve a combination of direct employment, agency staff, outsourced services and international supply chains. Our risk assessment will consider both the product value chain and the supporting labour chain, including recruitment and labour intermediaries.

| Area                                | Illustrative risks to assess                                                                                                                                  | Primary controls                                                                                                         |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| Production and temporary workers    | Agency workers, migrant workers, recruitment fees, insecure work, excessive overtime, wage deductions or lack of accessible information.                      | Approved recruitment agencies; right-to-work checks; worker interviews; wage/hour checks; accessible grievance channels. |
| Electronic components and materials | Forced labour or exploitation in upstream mining, refining, chemicals, material processing, semiconductor/component manufacture, PCB fabrication or packaging | Supplier mapping; risk screening; contractual standards; origin and traceability questions; corrective action.           |
| Outsourced processes                | Subcontracted assembly, rework, testing, plating, logistics or warehousing may reduce visibility of working conditions.                                       | Pre-qualification; due diligence; flow-down clauses; risk-based audits and worker voice.                                 |
| Facilities and services             | Cleaning, security, catering, maintenance, waste and transport may involve low-paid, migrant or agency workers.                                               | Supplier Code; right to work checks; contract oversight; site access and worker reporting routes.                        |
| Purchasing practices                | Urgent orders, unrealistic lead times, price pressure or late changes can increase excessive overtime or unauthorised subcontracting.                         | Responsible purchasing; realistic planning; escalation of capacity constraints; no retaliation for refusing unsafe work. |

This table identifies potential exposures, not findings of actual modern slavery. Procurement and the Modern Slavery Lead will review the risk assessment at least annually and when there is a new supplier, country, process, labour model, acquisition, incident or significant change in purchasing.



## 5. Policy standards

Assembly Contracts Limited expects the following minimum standards in its business and supply chains:

**No forced labour.** Work must be freely chosen. No threats, violence, coercion, deception, debt bondage or restrictions designed to prevent a worker leaving.

**No child labour.** Suppliers must not employ anyone below the applicable legal minimum age. Young workers must be protected from hazardous work and harmful hours.

**Freedom of movement.** Workers must be free to leave work and accommodation during lawful rest periods. Original identity documents must not be confiscated or retained.

**Fair recruitment.** Workers must receive clear terms in a language they understand. Workers must not pay recruitment, placement, transport or employment fees; where such fees are found, they must be repaid.

**Pay and working time.** Pay, deductions, benefits and working hours must comply with law and contract. Overtime must be voluntary, properly paid and not used coercively.

**Respectful workplace.** No violence, threats, harassment, intimidation, discrimination or degrading treatment.

**Voice and representation.** Workers may raise concerns, join or not join lawful worker organisations and participate in collective bargaining without retaliation.

**Responsible purchasing.** Our decisions must not knowingly drive unlawful labour practices. Capacity, lead times and changes will be discussed with suppliers and escalated where risk is identified.

**Access to remedy.** Where our actions have caused or contributed to harm, we will cooperate in remedy. Where we are directly linked to harm, we will use leverage and support appropriate remediation.

## 6. Responsibilities

| Role                                      | Responsibilities                                                                                                                                                                                 |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Board / directors                         | Approve this policy, provide oversight, resources and challenge; review significant incidents and progress.                                                                                      |
| Operations Director / Modern Slavery Lead | Own implementation; coordinate risk assessment, investigations, reporting and improvement; maintain records; escalate material issues to the Board.                                              |
| Procurement / Purchasing                  | Map suppliers; apply due diligence and contractual standards; consider country, sector and labour risks; avoid purchasing practices that increase exploitation risk; monitor corrective actions. |
| HR / people managers                      | Maintain fair recruitment and employment practices; oversee agency workers; provide induction and training; respond safely to worker concerns and protect against retaliation.                   |
| Quality / Operations                      | Control subcontracting and site access; support supplier assessments; report indicators or concerns; ensure production planning is escalated when it may create labour risk.                     |
| All workers and representatives           | Read and follow this policy; remain alert to indicators; raise concerns promptly; cooperate with investigations; never threaten or retaliate against a person who speaks up.                     |



|                                   |                                                                                                                                                                                 |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Suppliers and employment agencies | Meet the minimum requirements in Appendix B; provide accurate information; flow standards to their own suppliers; notify us of concerns; cooperate with remediation and audits. |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 7. Supplier and Workforce due diligence

We will use a proportionate, risk-based process. Passing a questionnaire is not, by itself, proof that a supply chain is free from modern slavery. Higher-risk suppliers require deeper engagement and evidence.

### 7.1 Before appointment or renewal

- identify the supplier, service, location, ownership, production site and known subcontractors;
- screen the supplier and relevant workforce providers using available risk information, including sector, country, workforce and recruitment risks;
- request acceptance of our Supplier Code of Conduct or equivalent standards and include modern slavery obligations in contracts;
- ask how workers are recruited, paid and housed, whether labour agents are used, and whether workers pay any fees;
- assess capacity, lead times, pricing and changes to ensure our own purchasing practices are responsible; and
- record the risk rating, approval decision, conditions and review date.

### 7.2 Ongoing monitoring

- maintain a supplier register and improve visibility beyond tier 1, prioritising higher-risk materials, processes and labour providers;
- use supplier declarations, document reviews, audits, site visits, worker interviews and grievance data as appropriate;
- verify rather than rely solely on self-assessment, especially where indicators or credible allegations exist;
- require corrective action plans with owners, deadlines and evidence; and
- use leverage, collaboration, suspension or termination carefully. Ending a relationship without considering worker impact may worsen harm, so decisions must be risk assessed and victim centred.

### 7.3 Records

Purchasing will retain proportionate evidence of supplier risk assessments, approvals, contracts, declarations, audits, findings, corrective actions and escalations in accordance with the company record-retention rules and applicable data protection requirements.

## 8. Raising a concern

Anyone may raise a concern about modern slavery, forced labour, trafficking, recruitment fees, document retention, threats, unlawful deductions, child labour or retaliation. A person does not need proof before reporting a reasonable concern.

### Internal routes

- tell a line manager;
- contact HR or the Modern Slavery Lead;
- use the company whistleblowing channel;
- use any customer, worker representative, union or supplier grievance route available.

**If someone may be in immediate danger, contact emergency services first. Concerns can also be reported to the UK Modern Slavery Helpline on 08000 121 700. The Gangmasters and Labour Abuse Authority can be contacted on 0800 432 0804 or through its online reporting route.**

Reports will be handled sensitively and, where possible, confidentially. Information will be shared only with people who need it to assess, protect, investigate, report or remedy the concern. Anonymous reports will be accepted where practicable. No one will suffer dismissal, demotion, harassment or other detriment for raising a concern in good faith or assisting an investigation.

## 9. Response and remediation

A concern will be triaged promptly by the Modern Slavery Lead, with HR, Legal or external specialist support where needed. The response will prioritise safety, dignity, confidentiality and the wishes and needs of the affected person.

- protect the person from immediate harm and prevent retaliation;
- avoid confronting an alleged controller or alerting others in a way that could increase risk;
- preserve relevant records and assess whether evidence, safeguarding or law-enforcement referral is needed;
- appoint an appropriately independent investigator and use interpreters or specialist support when needed;
- work with the affected person and suitable expert organisations to determine remedy, which may include repayment of fees or wages, safe accommodation, medical or psychological support, legal support, restoration of documents, safe return or continued employment by choice;
- notify relevant authorities where required by law or where necessary to protect people, taking account of safeguarding and victim-centred principles;
- take corrective and preventive action, including changes to recruitment, purchasing, supplier controls, training or supervision; and
- document decisions, outcomes, lessons learned and follow-up checks.

We will not require a suspected victim to prove their status before taking protective action. We will not use disciplinary action, contract termination or repatriation as an automatic first response where that could increase risk or remove access to remedy.

## 10. Training and communication

Training will be proportionate to role and risk. All workers will receive an accessible introduction to this policy, how to raise a concern and the prohibition on retaliation. Additional training will be provided to:

- purchasing staff, on supply-chain risk, responsible purchasing, supplier engagement and escalation;
- HR and managers, on fair recruitment, agency recruitment, indicators, safe conversations and safeguarding;
- quality and operations teams, on subcontracting, site indicators, worker voice and incident escalation;
- senior leaders, on governance, risk appetite, resources, outcomes and annual reporting; and
- relevant suppliers and workforce providers, on contractual standards, worker communication, fees, grievance routes and remediation.

Information will be communicated in a form and language that workers can understand. Suppliers must communicate equivalent standards to workers and subcontractors, not merely to management.

## 11. Monitoring and performance

The Modern Slavery Lead will report at least annually to the Board on implementation and effectiveness. Measures may include:

- percentage of active suppliers risk assessed and reviewed;
- percentage of higher-risk suppliers with a completed assessment, audit or equivalent evidence;
- percentage of relevant employees and managers completing training;



- number and type of concerns raised, response time, substantiation and remediation status;
- number of workers identified as having paid recruitment fees and amount repaid;
- number of corrective actions overdue or closed with evidence;
- supplier and agency breaches, suspensions, exits and improvements;
- coverage of tier 2 and below mapping for priority materials and services; and
- worker feedback, grievance accessibility and evidence that no retaliation occurred.

We will not treat “zero reported cases” as proof that risk is absent. We will assess whether reporting channels are trusted and accessible, whether worker voice is present, and whether our controls are finding and resolving issues.

Public reporting will be accurate, proportionate and transparent about gaps and improvement actions.

## 12. Breaches and consequences

A breach of this policy may result in investigation, corrective action, retraining, disciplinary action up to and including dismissal, or termination of a supplier or contract, subject to applicable law and fair process. Suspected criminal conduct may be reported to the appropriate authorities.

Any commercial decision affecting a supplier or worker after an allegation will consider safety, evidence, leverage, legal duties, continuity of remedy and the risk of pushing exploitation elsewhere.

## 13. Approval, review and related documents

This policy is approved by the Board of Directors of Assembly Contracts Limited. It will be reviewed at least annually, after a significant incident, or when there is a material change to the business, law, workforce model, supply chain or risk profile.

| Approved by | Board of Directors                                                                  | Date        |
|-------------|-------------------------------------------------------------------------------------|-------------|
| Name / role | Lee Willaims – Operations Director                                                  | 24/08/26    |
| Signature   |  | Next review |
|             |                                                                                     | 24/08/27    |

**Related documents:** Supplier Code of Conduct; Whistleblowing Policy; Equality Policy; Health and Safety Policy; Purchasing Procedure; Data Protection Policy.

## Appendix A - Practical indicators

One indicator alone does not prove modern slavery. Look at the overall circumstances, listen to the worker and escalate concerns safely. Potential indicators include:

- a worker appears fearful, controlled, coached or unable to speak privately;
- someone else holds a worker's passport, identity document, phone or money;
- workers are transported, housed or supervised in a way that restricts movement;
- wages are withheld, unexplained deductions are made, or workers do not understand payslips or contracts;
- workers report recruitment fees, loans, deposits, debt, threats or punishment;
- workers are required to work excessive or compulsory overtime or cannot refuse shifts;
- a supplier refuses access, provides inconsistent records or uses undisclosed subcontractors;
- workers live in overcrowded or unsafe accommodation linked to the employer;
- workers are recruited through brokers or agents whose fees and practices are unclear;
- there are signs of child labour, forged documents or unusual age profiles; and
- a worker raises a concern and then experiences threats, dismissal, reduced hours or other detriment.

**When speaking to a potentially affected person, use a private and safe setting, avoid promises you cannot keep, do not ask leading questions, do not pressure them to disclose details, and seek specialist advice where appropriate.**

## Appendix B - Supplier minimum requirements

The following requirements should be included in supplier onboarding and contracts, adapted to the supplier's size, location and risk:

- prohibit slavery, servitude, forced or compulsory labour, trafficking, child labour, threats, violence, coercion and retaliation;
- prohibit worker-paid recruitment fees and require repayment where fees have been charged;
- prohibit confiscation or retention of original worker identity documents except where lawfully required and with secure, voluntary access;
- provide workers with written terms, pay information and grievance routes in a language they understand; comply with applicable minimum wage, working-time, health and safety and employment laws;
- ensure employment providers and subcontractors meet equivalent requirements and are disclosed on request;
- maintain accurate records of recruitment, wages, hours, age, identity, agency fees and subcontracting;
- notify Assembly Contracts Limited promptly of any allegation, investigation, enforcement action or actual case connected with the work;
- permit proportionate due diligence, including documents, site access and confidential worker interviews, subject to lawful safeguards;
- cooperate with corrective action and victim-centred remediation; and
- accept that serious or unremedied breaches may lead to suspension, termination or other contractual remedies, subject to a risk-based decision that considers worker welfare.



# Appendix C – Relevant legislation and guidance

- Modern Slavery Act 2015
- Modern Slavery Act 2015 – Section 54, Transparency in Supply Chains
- Applicable employment legislation
- Applicable National Minimum Wage legislation
- Applicable working time legislation
- Gangmasters (licensing) Act 2004, where applicable
- Applicable data protection legislation
- Relevant UK Government modern slavery guidance.