

ANTI MODERN DAY SLAVERY STATEMENT ALE-IMS-02-HR-PLY-001a

Introduction

This statement sets out A.L.E UK Holdings Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

As part of the heavy transportation and lifting sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of A.L.E UK Holdings Limited "ALE" and its subsidiaries in the United Kingdom, Europe, North and South America, Asia, Africa and Australasia.

ALE aims to maintain and improve our position as a premium supplier of worldwide heavy transportation and lifting services to all sectors serviced. We do this by seeking new challenges, learning and adapting, and using the latest cutting edge technology to provide those services to a level of quality and flexibility that satisfies or exceeds customer, legal and other requirements. In order to do this ALE is committed to increase the effectiveness of our Integrated Management System, to continually improve competence levels, and to monitor performance and deliver supply chains that are free from slavery and human trafficking.

Countries of operation and supply

The organisation provides engineering services to multiple countries across the world with its Head office being based in the UK. Assessment of risk within health, safety, quality, environment "HSQE" and other areas is fundamental to our operations. The company applies a risk based approach to all business risks including that of slavery and human trafficking.

The company applies a risk assessment on the above areas in advance of new contracts and new operations and periodically on established locations.

High-risk activities

The board consider the services supplied by ALE to be at a low risk of slavery or human trafficking due to the specialised nature of our work which is equipment and technology led. Exposure to labour recruited via recruitment agencies is infrequent and considered low risk as workers are required to have certain skills and qualifications that carry higher marketable pay rates or salaries.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Managing Director is tasked by the board with putting in place and reviewing policies in this area and disseminating via Country Managers and HR coordinators.
- **Risk assessments:** The risk committee assess risk potential and assign controls and monitoring of those controls as appropriate.
- **Investigations/due diligence:** Self assessments and audit of control compliance is conducted by the HSQE team and Procurement specialists.
- **Training:** All employees have received guidelines and training to better understand and respond to slavery and human trafficking risks.

Relevant policies

The organisation operates an Anti Modern Day Slavery and Human Trafficking Policy and a Business Ethics policy that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Reporting of non-compliance

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. A whistle blowing policy is available for employees to use along with a confidential reporting system for industry called 'Ciras'.

Employee code of conduct

The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supplier/Procurement code of conduct

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics as outlined in our Business Ethics and Corporate Social Responsibility Policy. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

In relation to slavery and human trafficking, the company assesses areas of high risk within the key supplier base and conducts a pre-qualification questionnaire. This is revisited annually.

Recruitment/Agency Workers policy

The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. In relation to slavery and human trafficking, the company assesses areas of high risk within the key supplier base and conducts a pre-qualification questionnaire.

Due diligence

The organisation routinely undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers through audit and Key performance indicators. ALE has a zero tolerance to the issues of Modern Day Slavery. Consequences for the supply chain in failing to adhere to ALE's codes and policies will include severe sanctions or termination of business.

We are pleased to report there have been no instances of failed compliance in regard to our Supply Chain within the last financial year.

Training

The organisation requires all supply chain managers, Directors, General Managers, HSQE and HR professionals to complete training on modern slavery. The organisation's modern slavery training complies with the Ethical Training Initiative "ETI" and International Labour Organisation.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by communicating to staff and suppliers via a range of media including, e-mail flyers, posters, awareness campaigns.

Board approval

This statement has been approved by the board of directors who will review and update it annually.



Richard Peckover
Regional Director