

# ***Alston Investments Limited***

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Introduction**

In compliance with the Modern Slavery Act 2015, Alston Investments Ltd and subsidiaries provides the following statement regarding its efforts to prevent slavery and human trafficking in its business and supply chain.

### **Our Structure, Business & Supply Chains**

Alston Investments Limited (Alston) ,registered in England and Wales No: 08837616, owns Glendale Managed Services (Glendale), Parkwood Healthcare and Alston Properties.

Glendale is the largest subsidiary, and for the purposes of this statement that refers to Glendale Managed Services Limited, Glendale Grounds Management Limited, Glendale Countryside Limited, Glendale Horticulture Limited, Glendale Golf Limited and Glendale Community Golf Limited.

Glendale specialises in offering solutions for the total management and maintenance of the green environment. Glendale delivers a portfolio of nine specialist green services: grounds management, arboriculture, supply of plants and semi-mature trees, countryside management, estate management, vegetation control, landscaping, cleansing services and golf course management.

The procurement activities carried out by Alston mainly relate to plant, industrial equipment, vehicles, fuel, and UK and EU sourced labour. We work with a variety of suppliers from large corporations to sub-contractors and small local suppliers providing a wide range of products and services. The majority of our suppliers are based in the UK.

### **Policies**

Alston's commitment to prevent modern slavery is outlined in our Slavery and Human Trafficking Policy and our Purchasing Policy.

### **Due Diligence Processes in relation to slavery and human trafficking**

Alston will not support or deal with any business knowingly involved in slavery and/or human trafficking. The company has zero tolerance of any act(s) of modern day slavery and human trafficking within its business and its supply chains, including subcontractors and partners. The company acknowledges its responsibility as defined by the Modern Slavery Act 2015 and ensures transparency within the organisation and its suppliers of goods and services.

As part of the company's due diligence processes in connection with its slavery and human trafficking policy, the supplier approval process requires suppliers to comply with the Modern Slavery Act and to submit evidence as to how they take steps to mitigate this issue, where required. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources is continually monitored.

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Alston uses select providers to manage its small amount of agency and temporary worker requirements. The contracts require the provider to ensure compliance by itself and its suppliers with the requirements of the Modern Slavery Act.

## **Identification of the risk of slavery and human trafficking in our business and supply chains, and the steps taken to assess and manage risk**

In terms of identifying indirect suppliers (for example, suppliers of components which form part of the equipment purchased by Alston), each direct supplier is required under Alston's compliance requirements to confirm that their supply sources for any components or labour for their equipment are compliant with the Modern Slavery Act.

In terms of use of direct labour within the UK, Alston employs approximately 1,500 employees on direct contracts of employment, all of which are compliant with UK and EU legislation. Wages are paid electronically directly to employee's bank account and all new employees of Alston are required to provide the appropriate Right to Work evidence in line with Home Office guidance. Alston is fully compliant with the legislative requirements of both the National Minimum Wage and the National Living Wage.

With regards to indirect labour, Alston uses carefully selected providers to manage its small amount of agency and temporary worker requirements. A Service Level Agreement is in place with the suppliers which obliges them to comply with the Modern Slavery Act, amongst other regulations. In addition, we understand that the compliance safeguards within the suppliers payroll systems mean that a worker cannot be supplied to Alston unless they have provided the correct documentation in relation to their right to work in the UK.

Where Alston employs subcontractors to carry out work on its behalf, the sub-contract agreement contains obligations to comply with the Modern Slavery Act and other employment legislation.

## **Implementation**

In order to achieve our objective of tackling slavery, forced labour or human trafficking, we will:

- Require all of our suppliers to provide self-certification confirming that they are not aware of any incidents of slavery, forced labour or human trafficking occurring within their business and own supply chain;
- Undertake regular reviews of our supply chain and identify any potential risks. Those suppliers that are identified will be allocated a risk profile based on the information available to us and monitored;
- Where suppliers fall short of our expectations, require a remediation plan be prepared, implemented and reviewed to address any shortcomings highlighted;
- Provide relevant employees with training to recognise any signs of slavery, forced labour or human trafficking within our supply chain and encourage practices to mitigate the risk of this occurring;
- The Company encourages anyone to raise any concerns about modern slavery and will support anyone who acts in good faith. The Company has a whistleblowing policy which can be used to report any instances of modern slavery;

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Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

## **Effectiveness**

Potential suppliers who fail to confirm that their supply sources for any components or labour for their equipment are compliant with the Modern Slavery Act are not added to the supply chain.

Through monitoring, any suppliers who become non-compliant with the Modern Slavery Act are removed from the supply chain.

## **Training**

During the year, we have continued to provide advice and guidance to those teams who have direct responsibility for relevant supply chains.

## **Responsibility & Implementation**

The company directors and senior management take responsibility for implementing the Modern Slavery and Human Trafficking Policy and this statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of the Modern Slavery and Human Trafficking Policy is accessible to all employees electronically or can be obtained from the HR department upon request. This policy statement will be reviewed annually and published.

This statement is made pursuant to section 54(1) Modern Slavery Act 2015 and constitutes Alston's Slavery and Human Trafficking statement for the financial year ended 31 December 2018. It has been approved by its Board of Directors.

Signed.....



Position - Director

Financial Year End: 31/12/2018

Dates this statement covers: 01/04/2019 - 31/03/2020

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