



ASTRAL LIMITED

**MODERN SLAVERY & HUMAN
TRAFFICKING POLICY**

Issued: April 2026
Next Review: April 2027

Modern Slavery & Human Trafficking Policy

1. Purpose

This policy outlines Astral Limited's commitment to preventing, identifying and addressing modern slavery and human trafficking within our construction operations and supply chains. Astral maintains a zero-tolerance stance on any form of modern slavery and will uphold ethical and responsible business conduct throughout all tiers of our organisation and supplier network.

2. Scope

This policy applies to:

- All Astral employees and officers
- Labour only subcontractors
- All suppliers and service providers
- Recruitment and labour hire agencies
- Any third parties acting on behalf of Astral

It covers all construction sites, offices and supply chain activities.

3. Definitions

Modern slavery

Slavery, servitude, forced or compulsory labour, bonded labour, child labour and human trafficking.

Human trafficking

The arrangement or facilitation of travel by a person for the purpose of exploitation.

Supplier

Any organisation or individual supplying goods, materials, plant, labour or services to Astral.

4. Organisational structure and supply chains

Astral operates within the UK construction sector, delivering building, refurbishment and maintenance works. Our supply chain includes:

- Tier1 subcontractors
- Labour only subcontractors
- Recruitment and labour agencies
- Material suppliers and distributors
- Plant and equipment providers

We maintain an **Approved Supplier & Subcontractor List**, which is risk rated and reviewed regularly.

5. Policy statement

Astral is committed to:

- Preventing modern slavery and human trafficking across all operations
- Ensuring transparency and accountability within our supply chains
- Implementing robust prevention, detection and reporting measures
- Upholding fair working conditions and responsible labour practices
- Continuous strengthening of controls, training and governance

6. Governance and responsibilities

Board of Directors

Approves this policy and the annual Modern Slavery Statement; receives quarterly reports.

Compliance Lead

Oversees policy implementation, due diligence, incident response, audits and training.

Procurement

Manages supplier checks, contract clauses, monitoring and enforcement.

HR

Conducts right to work checks, manages agency labour compliance and training records.

Site and Project Managers

Ensure subcontractor compliance on sites, conduct worker interviews and escalate concerns.

All workers

Must report concerns immediately through approved reporting channels.

7. Risk assessment

Astral performs an annual risk assessment that considers:

- Labour related risks (agency workers, migrant labour, language barriers)
- Material related risks (high risk country origins for stone, steel, electronics)
- Operational risks (night work, tight deadlines, large subcontractor workforces)
- Commercial pressures (unrealistic pricing or delivery expectations)

The assessment produces a risk map, mitigation plan and updated risk register.

8. Due diligence

Baseline checks for all suppliers

- Company identity and trading history
- Confirmation of compliance with the Modern Slavery Act
- Worker verification and right to work processes
- Wage and working hours transparency
- Agreement to Astral's Supplier Code of Conduct

Enhanced checks for high-risk suppliers

- Announced and unannounced audits
- Private worker interviews
- Review of payslips, hours, deductions and recruitment fees
- Supply chain mapping beyond Tier 1 (where practical)

Contractual controls

- Zero tolerance clause
- Audit and inspection rights
- Obligation to cascade standards to subcontractors
- Incident notification within 24 hours

9. Labour standards, recruitment and agency controls

Astral requires that:

- All workers are paid fairly, lawfully and provided with access to payslips
- Only approved labour agencies are used
- No recruitment fees are charged to any worker
- Subcontractors provide accurate worker lists before starting work
- Accommodation and transport (where provided) are safe, voluntary and fairly priced

10. Training and awareness

Astral provides:

- Annual modern slavery awareness training for all staff
- Enhanced training for procurement, HR and site management roles
- Toolbox talks and induction modules for subcontractors
- Visibility of reporting channels on all construction sites

11. Reporting and whistleblowing

Concerns may be reported through:

- **Email:** mail@astralltd.co.uk
- **Telephone:** 01795 666955
- **On site:** Direct report to the Site Manager or an Astral Manager

Reports can be anonymous. Astral enforces a strict nonretaliation policy and will investigate all concerns promptly.

12. Worker Rights and Protections

Astral Limited is committed to upholding fundamental worker rights across all operations and supply chains. The following standards apply to all employees, subcontractors, agency workers and supplier workforces:

Freedom of employment

- All work must be voluntary. Workers are free to terminate their employment at any time, subject to reasonable notice periods defined by law or contract.
- No worker shall be subjected to forced, bonded or involuntary labour under any circumstances.

Freedom of movement

- Workers shall have full freedom of movement and shall not be physically confined to the workplace, accommodation or any associated facilities.
- Workers must not be subject to any restrictions on their movement outside working hours.

Freedom of association

- Workers have the right to freedom of association and to join or form trade unions or worker representative bodies of their choosing, without fear of retaliation, discrimination or harassment.
- Where the right to freedom of association is restricted by law, Astral will support alternative forms of worker representation.

Fair treatment and non-discrimination

- All workers must be treated with dignity and respect.
- Discrimination based on age, gender, race, nationality, religion, disability, sexual orientation or any other protected characteristic is strictly prohibited.

Prevention of harassment and abuse

- Any form of violence, harassment, intimidation, coercion or abuse—whether physical, verbal or psychological—is strictly prohibited.

Working hours and overtime

- Working hours must comply with applicable laws and industry standards.
- Overtime must be voluntary, not excessive, and compensated at appropriate rates in accordance with legal requirements.

- Workers must not be forced or coerced into working overtime.

Identity documents and personal possessions

- The confiscation, retention or destruction of original identification documents (such as passports, visas or work permits) is strictly prohibited.
- Where secure storage is offered, it must be voluntary and accessible to the worker at all times.

Recruitment practices

- Astral maintains a strict prohibition on worker-paid recruitment fees.
- No worker shall be required to pay fees, deposits or costs to secure employment.
- Where such fees have been charged in the supply chain, suppliers must provide reimbursement to affected workers.

Access to remedy and support

- All workers must have access to safe, confidential and accessible grievance mechanisms.
- Complaints will be investigated promptly, fairly and without retaliation.
- Where modern slavery or exploitation is identified, Astral will ensure appropriate remedy, including support, compensation and access to justice, in line with legal and ethical obligations.

13. Monitoring, KPIs and continuous improvement

Performance is monitored using:

- Supplier due diligence completion rates
- Number of supplier and site audits
- Employee and subcontractor training completion
- Number and status of reported concerns
- Quarterly updates to risk assessments

Outcomes are presented to the Board and captured in the annual Modern Slavery Statement.

Astral Limited is willing to be registered on the UK Government Modern Slavery Assessment Tool (MSAT) and will maintain registration for the duration of all public sector contracts should they be applicable. Evidence of registration or successful application will be provided to contracting authorities upon request.

14. Remediation and escalation

If modern slavery is suspected or identified:

1. Safeguard affected individuals
2. Investigate immediately
3. Implement a corrective action plan with the supplier
4. Suspend or terminate supplier relationships where necessary
5. Report to relevant authorities

15. Records and documentation

Records relating to due diligence, checks, audits, training and investigations are retained for a minimum of **six years**.

16. Review

This policy is reviewed annually or earlier if legislative, operational or risk related changes occur.

A handwritten signature in black ink, appearing to read 'P. Houghton', written in a cursive style.

Signed:

Managing Director

Date: 22nd April 2026