



## **Asset Alliance Group ('AAG' or 'the Company')**

### **Modern Slavery Statement**

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#### 1.0 Context

The Modern Slavery Act (MSA) 2015 combines serious criminal offences of slavery, servitude, forced or compulsory labour and human trafficking within one piece of legislation. The MSA is designed to protect victims and potential victims of modern slavery and our aim is to prevent modern slavery in our business, customer's businesses and supply chain.

Our approach to the MSA focuses on three key areas; employees, customers and suppliers.

#### 2.0 Our Employees

We expect our employees to be treated with respect, dignity and fairly. We also expect this to extend to our customers and suppliers. The Company's Code of Conduct extends to all employees, contractors and agency workers. This defines our values and expectations of our employees.

AAG has a defined process for reporting MSA related breaches and behaviour that does not meet the Company's values and Code of Conduct. Our employees are provided with a copy of the Company's employee handbook which outlines the steps they can take to report any concerns of wrongdoing or malpractice.

#### 3.0 Our Customers

Our customer relationships are governed by a range of risk considerations, including anti-money laundering and financial crime procedures. Our customer's businesses can have environmental, social and ethical impacts including human rights infringements. We conduct due diligence on our customers and transactions, where deemed appropriate, to enable us to consider their impacts.

We are taking steps to develop awareness of these crimes and human rights abuses to help our employees to identify and escalate concerns about a customer's potential involvement in modern slavery.

#### 4.0 Our Suppliers

We expect our suppliers to have similar values and commitments towards eradicating modern slavery in supply chains. As part of our supplier assessment we will consider the nature of their business and the potential for modern slavery within that business including its supply chain.

The complexity of our supply chain will often see different levels of suppliers between a manufacturer or distributor and the source of raw materials procured by those parties. Our objective is to ensure, where reasonably possible, that our suppliers adhere to the standards set out in the MSA regulations.

We intend to deliver training to relevant employees with particular focus on employees responsible for procurement of vehicles, trailers and other supplies.

#### 5.0 Due Diligence Process

By categorising our approach to MSA into the three groupings above we are aiming to bring focus to the identification of where risks may arise and to be in a position to address them. In order to manage these the Company adopts the three lines of defence model;

- First line of defence: Operational Management
- Second line of defence: Risk Management function
- Third line of defence: Group Board

As part of our due diligence we attempt to:

- Identify and assess potential risks within our business
- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring within our supply chains
- Identify and assess potential risk areas in our customer's businesses
- Mitigate the risk of slavery and human trafficking within our customer's businesses
- Protect whistle blowers

The Company recognises that training remains a critical part of raising awareness with its employees and in 2020 we will again re-enforce with our employees, through further training if appropriate, of the need to be vigilant towards identifying aspects of our supply chain most susceptible to Modern Slavery. Our due diligence process for new suppliers has been enhanced in 2019 to include a requirement to satisfy ourselves as far as is possible that modern slavery does not exist within those businesses. At all times we assess potential for Modern Slavery risks within our business, customers and supplier chain.

During the 12 months to 31 December 2019 no instances of modern slavery were identified within our business, customers or supplier chain.

Asset Alliance Group’s financial year end falls on 31st December and this statement covers the period from 01 January 2019 to 31 December 2019. Our Modern Slavery Statement was approved by the Board of Directors on 27 February 2020.

For and on behalf of Asset Alliance Group

A handwritten signature in dark ink, appearing to read 'Donald Wilson', with a long horizontal flourish extending to the right.

Donald Wilson  
Group Risk Director



