

## Modern Slavery Act Statement - 2016

Aspire Defence Services Limited (ADSL) is a project joint venture owned by Carillion and KBR that was formed to deliver Project Allenby Connaught, a 35 year contract to support the MoD across Salisbury Plain and Aldershot. The Company provides a broad range of services covering Facilities Management and also deliver projects, all activities delivered through a combination of self-delivery and sub-contract support. It employs over 950 staff.

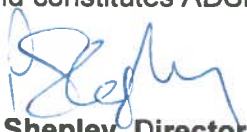
ADSL recognises that Modern Slavery, which includes human trafficking, is a horrific crime that fundamentally violates Human Rights, and which sadly remains an important issue that has no place in society. The organisation is therefore fully committed to meeting its obligations under the Modern Slavery Act with responsibility for compliance vested in the Senior Leadership Team reporting through the Audit Committee to the Board of Directors.

During 2016, ADSL has taken the following steps to support the strategic intention to eliminate any risk of Modern Slavery offences being committed by the organisation and its Supply Chain:

- An initial 'risk assessment' to help identify activities where circumstances might allow Modern Slavery crimes to be undertaken. This has concluded that recruitment, staff management, supplier due diligence and supplier management are the areas of greatest concern.
- Concerning recruitment, our policy is to vet all staff to ensure their suitability to work for ADSL. In practice, this process also involves security clearance which provides some further protection against Modern Slavery abuses.
- Our staff management procedures are mature, involving regular reviews and 'grandparent' reviews to offer further protection to our staff. In addition, we operate a well-publicised Whistleblowing 'hotline', providing staff with the facility to raise any concerns to a trained, independent professional with an escalation path to the Whistleblowing committee reporting to the Board through the Audit Committee.
- From a Supply Chain perspective, we have continued to operate strong controls in relation to undertaking due diligence on suppliers. Before introducing a new supplier, we undertake a thorough qualification exercise in which we assess business suitability and technical expertise for the work they would be engaged to perform. As part of this process we require all suppliers to sign up to a Supply Chain Code of Ethics, requiring them to evidence their commitment to ethical behaviour.
- In addition, our processes for supplier selection and supplier management are robust.
- We have developed training materials for cascade to all staff across the business to promote understanding of the issues and the responsibilities individuals face to promote the initiative.

Notwithstanding the controls framework outlined above we are committed to enhancing processes, procedures and general awareness about this subject to further strengthen our approach. During 2017 we will instigate a review process with our key Supply Chain partners. In addition, we will proactively seek assurances from our Supply Chain in relation to the actions they undertake to demonstrate commitment to the objectives of the legislation and assess those responses. We will also provide further information to our staff to promote greater personal engagement in the drive to eradicate Modern Slavery and encourage staff to raise any concerns with senior management or through the Whistleblowing line.

This statement is made in accordance with the requirements of Section 54 of the Modern Slavery Act 2015 and constitutes ADSL's Modern Slavery Act statement for the year ended 31 December 2016.



**P Shepley, Director**  
April 2017