



## Tackling Modern Slavery and Hidden Labour Exploitation Policy

Astral Solutions Limited commits to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

Modern slavery is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

Forced labour is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

Debt-bonded labour is where a person's labour is demanded as a means of repayment for a loan or service.

Human trafficking is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

Hidden labour exploitation is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

### Scope

This Policy applies to all locations where Astral Solutions limited operates.

### Commitments

Astral Solutions Limited shall:

1. The Director of the Company is responsible for ensuring ethical labour standards are applied and for protecting human rights of those working in the business.
2. The Director of the Company is accountable for leading the implementation of operational due diligence steps to reduce and address the risks of modern slavery and hidden labour exploitation throughout the business.
3. All individuals within the company have responsibility in spotting the signs of exploitation and how to handle and report suspected cases has been clearly defined and communicated to them.
4. The Company will provide information on tackling hidden labour exploitation to its existing and new workers through leaflets and internet.
5. The Company will ensure that any suspicious cases of shared bank accounts, next of kin details and addresses are investigated and reported.
6. The Company will ensure that sourcing, recruitment and workers' assignments are under the control of trusted and competent employees.

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7. Astral Solutions Limited will not use any individual or organisation to source and supply workers without confirming that workers are not been charged a work finding fee.
8. The Company will ensure that all staff responsible for directly recruiting workers have been fully trained to spot hidden labour exploitation signs; investigate further using Stronger Together worker questionnaire and interview questions and report to the authorities any suspicious cases.
9. The Company provides all employees with information on modern slavery and encourages them to report to the Director any suspicious cases.
10. The Company will investigate any report from an employee and if needed will escalate to the relevant external authorities.

### Assessment

Astral Solutions limited understands that supplies workers to sectors that are deemed to be in high risk of exploitation of workers. To tackle this issue we have provided training in Tackling Modern Slavery in the UK to staff engaged in direct recruitment and payroll officers. Awareness leaflets, posters, video and information about the nature of modern slavery its signs, how to spot them and report suspicious case are incorporated in the induction process. Regular checks have been conducted to identify multiple use of same address, bank account and / or telephone number. Stronger Together's Recruiter Compliance Principles and Worker Interview Questions are the core of the interview process. We provide all workers with key information document and assignment schedule prior to contract Workers are aware they can report any issues either anonymously via the company's website, directly to the director of the company or to the relevant authorities.

### Action

Astral Solutions Limited will:

- Keep providing information on tackling hidden labour exploitation and raise awareness amongst our existing and new workers through leaflets, videos, induction process and training and encouraging them to report any suspicious cases either directly to the director or by using the suggestion box on our company's website.
- Keep conducting checks on addresses, bank accounts, phone numbers and next of kin and ensuring that any that any suspicious cases of multiple use of same bank accounts, addresses, telephone numbers and next of kin details are investigated and reported.
- Keep ensuring that sourcing, recruitment and workers' assignments are under the control of trusted and competent employees who abide by the recruitment Compliance Principles.
- Keep ensuring that all staff responsible for directly recruiting workers have been fully trained to spot hidden labour exploitation signs; investigate further using Stronger Together worker questionnaire and interview questions and report to the authorities any suspicious cases.
- Only source workers directly and will not use second tier suppliers and consequently removing the risk of exploitation coming from a supply chain.
- Investigate any report and if needed escalate the matter to the relevant external authorities.



### Respond and Monitor

We have outlined how to address and report suspected cases of exploitation and how to protect the victim in our Modern Slavery induction pack.

Where criminal exploitation is believed to be involved and/or the worker is in real and immediate danger, notification must be made to the enforcement agency and/or relevant victim support organisation and initial protection provided by the employer for the victim until law enforcement and support arrive, i.e.:

- Remain with the potential victim in a safe area (such as the office).
- Do not draw attention to the fact that they have sought assistance; for example, do not keep the potential victim in view of those who have exposed the potential victim to forced or bonded labour abuses.

Where there is more than one potential victim, it is advisable to put them in separate rooms. It may not be possible to know who is being exploited and who is an exploiter.

Reassure potential victim(s) that their confidentiality will be protected.

Where the exploitation of one job applicant or worker is discovered, due consideration must be given to the risk of other job applicants or members of the workforce also being in an exploitative situation.

### Communication

We are committed to be open and transparent, to provide information on hidden exploitation and to report in line with accepted good practice.

This policy will be reviewed and updated annually.

29/01/2026

Veselina Kindzhakova

Director

A handwritten signature in black ink, appearing to read "Veselina Kindzhakova", with a decorative flourish at the end.

Issue date	Approved by	Issue No
15/01/2024	V.Kindzhakova	2
15/01/2025	V.Kindzhakova	3
29/01/2026	V.Kindzhakova	4

