

Modern Slavery Statement

Statement period: Financial year ended 31 December 2025

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes ASECCA Limited's Modern Slavery and Human Trafficking statement for the financial year ended 31 December 2025. ASECCA publishes this statement voluntarily — our turnover does not currently meet the £36 million statutory threshold that triggers the obligation to publish, but we hold ourselves to the same standard.

1. Our business

ASECCA Limited is a UK-based IT asset lifecycle management company. We operate a circular economy model for the secure recovery, reuse, redeployment and recycling of corporate IT equipment. Our core service is secure data destruction and the recovery of materials from end-of-life IT.

We operate from UK premises. Our staff are UK-based. We do not have overseas operations or overseas employees.

2. Our supply chain

ASECCA's material suppliers fall into the following categories:

- **Downstream licensed recyclers** — UK-based licensed waste carriers and material processors (including SWEEEP Kuusakoski Ltd) to whom we route recovered materials for further processing.
- **Transport partners** — UK-based logistics providers handling customer collections and downstream movement of recovered materials.
- **Cloud platform providers** — Microsoft (Microsoft 365, Azure, Entra) and other approved SaaS vendors.
- **Hardware vendors** — Dell (workstations and laptops) and Apple (Mac, iPhone) as our standardised endpoint vendors.
- **Consumables suppliers** — UK-based providers of operational consumables.

The most material modern slavery risks in this supply chain sit in **hardware manufacturing** (Dell and Apple — globally sourced electronics components and assembly) and to a lesser extent in **downstream materials recovery** (where downstream processors may have onward supply chains we cannot fully see).

3. Our policies

The following internal policies operationalise our modern slavery commitments:

- **Human Rights and Modern Day Slavery Policy** — ASECCA's internal commitments, prohibited conduct, reporting and review.
- **Supplier Code of Conduct and Supply Chain Risk Management Policy** — standards we require from suppliers, including on labour standards and modern slavery.
- **Whistle Blowing Policy** — confidential reporting route for any concerns, including modern slavery concerns.
- **Pre-Employment Checks Policy** — confirms right to work, ensures no coercion or employment fees in recruitment.

4. Due diligence

ASECCA's due diligence on modern slavery operates through:

- **Pre-employment checks** for all ASECCA staff — right to work confirmation, identity verification, no employment fees charged to candidates.
- **Supplier onboarding** — material suppliers acknowledge the Supplier Code of Conduct, which sets ASECCA's labour standards and modern slavery expectations.
- **Annual material supplier review** — conducted by the Head of Operations, with the modern slavery dimension considered alongside other ethical and operational factors.
- **Hardware vendor selection** — we standardise on Dell and Apple, both of which publish their own modern slavery statements and operate audited supply chain programmes. We rely on these vendor programmes for upstream electronics-manufacturing assurance.
- **Public sector engagement** — where ASECCA works with public sector or large enterprise customers, we accept and operate to their supplier ethics frameworks where applicable.

5. Risk assessment

Based on the supply chain described above, our assessment is:

- **ASECCA's own operations:** *Low risk*. UK-based, small workforce, all pre-employment checks completed, no use of agency or third-party labour in core operations, no overseas operations.
- **Downstream recyclers and transport partners (UK):** *Low-to-medium risk*. These sectors are exposed to subcontracted labour and itinerant working patterns. We mitigate through supplier selection (licensed operators only), Supplier Code of Conduct acknowledgement, and annual supplier review.
- **Hardware vendors (Dell, Apple):** *Medium inherent risk* — global electronics supply chains are widely recognised as exposed to modern slavery indicators. ASECCA mitigates by relying on vendors that operate audited supplier programmes and publish modern slavery statements of their own.
- **Cloud platforms and SaaS vendors:** *Low risk*. These are technology services with limited physical-labour supply chain exposure.
- **Consumables suppliers:** *Low risk*. UK-based, limited materiality.

ASECCA has identified **no instances of modern slavery** in its operations or material supply chain during the period covered by this statement.

6. Effectiveness measures

We track the effectiveness of our modern slavery work through the following indicators:

- **Supplier Code of Conduct acknowledgement coverage** of material suppliers — target 100%
- **Annual material supplier review completion** — target 100% of material suppliers
- **Modern slavery concerns raised via Whistleblowing** — current period: zero
- **Pre-employment check coverage** for all new hires — target 100%
- **Hardware vendor selection** limited to vendors operating audited supplier programmes — current period: 100% (Dell, Apple)

7. Training

All ASECCA staff receive induction training covering ethics, anti-bribery, whistleblowing and modern slavery awareness. Staff in supplier-facing roles (procurement, supplier management) receive additional content on the indicators of modern slavery in supply chains.

8. Plans for the next financial year

For the financial year ending 31 December 2026, ASECCA plans to:

- Maintain 100% Supplier Code of Conduct acknowledgement coverage for material suppliers
- Refresh and re-issue modern slavery awareness training for all staff
- Review the modern slavery dimension of supplier onboarding documentation
- Re-issue this statement within six months of the close of FY 2026

9. Approval

This statement has been approved by the Board of ASECCA Limited and is signed by the Chief Executive Officer. It will be reviewed and reissued annually within six months of the close of each financial year. The next refresh is due no later than 30 June 2027.

Approved by:

Jeff Pilkington
Chief Executive Officer
ASECCA Limited

Digitally signed: 29 June 2026