



## Air-Switch Limited

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## Modern Day Slavery / Human Trafficking Policy and Checking Illegal Working / Right to Work in UK

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## 1. Introduction

Air-Switch Limited is committed to eliminating modern slavery and human trafficking from our operations and supply chain. This policy will be reviewed with all employees during induction to ensure awareness, compliance, and understanding.

## 2. Commitment to Modern Slavery Act Compliance

We adhere to the Modern Slavery Act 2015 and implement transparency across our organisation, as well as among suppliers, subcontractors, and service providers. This policy applies to all employees, suppliers, and partners engaged with Air-Switch Limited.

## 3. Employee Identification and Right to Work Checks

Air-Switch Limited ensures all role applications are subject to internal controls and ID verification to confirm eligibility to work in the UK. ID verification and documentation, which align with Home Office requirements, are securely stored for a minimum of two years after employment ends, in compliance with UK GDPR requirements.

## 4. Role Application and Internal Controls

Our Managing Director is qualified to verify employee ID and eligibility to work. Each role application undergoes a verification process, ensuring compliance with the Immigration, Asylum & Nationality Act 2006. This process is conducted internally, with relevant records held in accordance with data protection requirements.

## 5. Policy Application to Agency and Subcontracted Personnel

This policy applies to all personnel, including agency workers, subcontractors, and self-employed individuals, to confirm work eligibility within the UK. Verification is conducted for all prospective and current employees to uphold compliance.

## 6. Annual Review of Right to Work Compliance

We conduct an annual review of compliance with right-to-work requirements for all employees, including any agency or temporary staff, to ensure sustained adherence to Home Office regulations.

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## **7. Due Diligence in Supply Chain**

Air-Switch Limited conducts a supplier approval process that includes evaluating supplier controls against slavery and trafficking risks. Goods sourced from higher-risk regions receive enhanced oversight. We will not engage suppliers known to participate in slavery or human trafficking practices.

## **8. Management Responsibility and Resources**

Our Directors and senior management are accountable for the implementation of this policy and ensure sufficient resources, including training and investment, are allocated to prevent modern slavery within our organisation and supply chain.

## **9. Accessibility and Review**

This policy, along with the Modern Slavery Act 2015, is accessible to all employees via electronic systems and through the HR department. It is reviewed annually to ensure ongoing relevance and transparency.

## **10. Data Handling and GDPR Compliance**

We do not operate under a formal Quality Management System (QMS), but all employee and ex-employee data is handled and stored in compliance with UK GDPR regulations, ensuring security and privacy.

## **11. Formal Procedures and Disciplinary Actions**

Breaches of this policy are investigated thoroughly, and formal or disciplinary action may be taken if necessary. Procedures are in place to communicate this policy throughout the organisation and ensure regular reviews for effectiveness.

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