

ALS People Modern Slavery Statement 2026

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Introduction

March 2026

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Our progress report for 2026 comes amidst the backdrop of the UK Governments mandate and employment law bill. It remains the primary focus of ALS to remain vigilant to the risks of modern slavery. People are the principle focus of our organisation; our culture and values remain resolute and will continue to be engrained in our organisation as we continue to grow.

Our values are clear:

- We listen.
- We care.
- We solve problems.
- We are approachable.
- We challenge.

In reflecting on our achievements and challenges over the past year, we find ourselves amidst an ever-evolving landscape, both globally and locally. As we present our statement for the year, we are acutely aware of the dynamic forces shaping our world – from ongoing shifts in migration patterns and the lasting ramifications of geopolitical changes such as Brexit, the conflict in Gaza and the ongoing Ukrainian War.

We recognise our moral and legal obligation to go beyond mere compliance, We have scaled up our in-house compliance checks, audits, and inspections while enhancing the training provided to our team members to bolster their vigilance.

Responsible Recruitment is more than a strapline for ALS People, it is a culture and ethos we continue to spread amongst our people, our customers, and our workforce. This culture helps to reduce our exposure to modern slavery by promoting active engagement with the workforce, a principle of ‘if in doubt, shout’ and ensuring our workers feel supported and encouraged to speak up if they feel their wellbeing is at risk.

We have increased our collaboration with our customers and worked in partnership to tackle modern slavery. We will ensure we learn from the large companies in the industries we serve, taking inspiration from their initiatives, goals and objectives to work towards a collective goal of eradicating slavery.

We continue to work closely with Slave Free Alliance, Stronger Together and Hope for Justice to help ensure we remain diligent and focused on eliminating the risks of modern slavery. We are also signatories to the Welsh Government’s Code of Practice for Ethical Employment. We have ensured a transparent and collaborative approach with these organisations.

On top of previous initiatives, our poster campaigns, social media posts, eLearning packages, bespoke training from Slave Free Alliance, worker booklets, PPE campaigns and other initiatives continue to ensure our culture is clear. We will be responsible, ethical and transparent and we will protect our workers above all else.



Organisational structure

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ALS Managed Services Ltd, Trading as ALS People.

We specialise in recruiting temporary and permanent workers across a range of sectors throughout the UK. Our experience in the recruitment industry spans waste & recycling, warehousing and logistics.

Our company was launched in November 2014 and since then, we have experienced significant growth and expansion. We have more than 40 years' experience in the recruitment industry, supporting customers right across the UK.

The heart of ALS People is based at our headquarters in Ystrad Mynach, South Wales. We operate a variety of regional hubs and on-site teams located at customer sites across the UK.

Our board of directors remains closely connected to our clients and their evolving requirements. With an experienced and highly skilled UK-based team of Regional Account Directors reporting into the main board, who in turn are supported by dedicated regional and on-site account management teams.



Our business and supply chains

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We operate a 'hub and spoke' model of recruitment, having never seen a branch-based model as being the future of recruitment, we continue to run our business with limited office infrastructure.

As our business evolves, we continue to work closely with trusted suppliers and partners to improve their ability to identify and manage the risks of modern slavery. We will continue to audit our supply chain and go further by investigating the 2nd and 3rd tiers of suppliers, for example our PPE suppliers, IT support, legal and external consultancy. 100% of supply chain spend is UK Based

Our Head Office in Ystrad Mynach, South Wales supports operations throughout the UK. We utilise a selective panel of less than 50 partner recruitment agencies to support national contracts, allowing us to provide innovative solutions to public and private sector customers across the UK.

Workers, irrelevant of supplier, are included in modern slavery workshops we complete with customers and can reach out to ALS and 3rd Party confidential whistleblowing helplines.

We set high expectations of our own business and ensure we cascade this same standard to all our suppliers. We extend our control measures and knowledge to our supply chain to help further reduce the risks of modern slavery and protect our customers and workers. Suppliers are verified, credit checked and audited to ensure compliance at regular intervals. Suppliers who are unable to demonstrate continued competency in this area are removed from our estate and black-marked against future usage.

As our layers of middle management expand, maintaining the integrity of our organisational culture remains a critical priority. We are committed to fostering an environment of transparency, fairness, and equality, with a strong focus on the welfare of our colleagues, workers, and customers.

Additionally, we undertake scheduled, cyclical audits of all our second-tier recruitment partners to identify and address risks associated with exploitation and modern slavery, as well as other compliance risks, including illegal payroll models, improper deductions, and practices inconsistent with our standards of responsible recruitment



Our commitment to eradicating modern slavery is weaved into many of our internal policies and procedures to ensure it remains relevant and a high priority in all our activities.

People policies

We cover all aspects of our employee journey (both temporary and permanent colleagues) including:

- Recruitment and Eligibility to Work
- Conduct
- Welfare and Wellbeing
- Whistleblowing
- Performance Management

Our people policies are further embedded into our ISO9001:2015 accreditation, ensuring we engrain quality standards into all that we do.

Supplier policies

We are a predominantly service driven business so have a limited supply chain. Strict controls are in place to reduce our risks, including:

- Annual Supplier Audits
- Requirement to demonstrate modern slavery policies.
- Suppliers approved at board level.
- Ethical Sourcing Standards (where relevant). Suppliers are risk assessed, and an appropriate monitoring plan is agreed at board level and reported quarterly.

We continue to complete annual audits on all suppliers including a programme of personal inspections on our suppliers, including unannounced audits to ensure their practices remained in line with our expectations.

We have further consolidated our supply chain to ensure we maintain close relationships with trusted partners who reflect our brand values and corporate behaviours.

External verification

We utilise external HR support to verify all policies and procedures and to identify further initiatives we can introduce to learn best practice from larger organisations. We review our own statement and policies against the actions of larger corporations and industry leaders in all sectors, including entities with large supply chains, significant reliance on temporary labour as well as similar profile companies to our own. Our procedures are reviewed annually by Slave Free Alliance to ensure we remain at the forefront of the fight against modern slavery.

We have attended a variety of seminars provided through our membership of Slave Free Alliance. We learn from our peer group and examples of excellence in the sectors we service and have taken key learnings into our business.

Responding to concerns

We have increased the number of communication points with our workforce and provided additional mechanisms for them to ask for help. These include:

- Internal whistleblowing helplines
- Hope for Justice contact details.
- Escalation contacts for complaints about ALS staff treatment
- Customer specific whistleblowing helplines
- A staff handbook

We recognise that any report of modern slavery from within our workforce presents a fluid and evolving circumstance and that it is difficult to formalise a decision tree or flow chart for our team. As such, we have simplified our approach to any member of our team that feels they have a concern about the wellbeing of their workforce or colleagues to “if in doubt, shout”. This ensures that a Director takes personal accountability for resolving the concerns about modern slavery, with relevant support from external partners as appropriate.

In addition, proactive interviews with our workforce, held impartially to the Account Manager for that location have helped us to uncover potential welfare issues with our workforce.

Corporate Governance

Our Board of Directors are integral to our business and hold key relationships with our larger customers. We have deliberately maintained a lean structure to our business, ensuring that a Director remains accountable for all customer interactions and maintains proximity to our customers to identify any areas for concern.

We increased our deployment of One-to-Ones, appraisals and a company wide incentive plan, with specific measures on compliance, modern slavery and worker wellbeing to ensure this is a clear discussion point during all formal interactions with our team.

Compliance

The team that faces our temporary workers are regularly trained on our policies and procedures in relation to modern slavery, using industry experience alongside our own experiences to share relatable, relevant and realistic scenarios for our learnings.

Regular refresher training and spot checks are completed to ensure ongoing awareness. Quarterly appraisals, regular seminars, external training, online training and additional communication all help to ensure our staff remain aware, diligent and empowered to challenge any concerns.

Our head office team remain impartial from any Account Manager, reporting directly into the Finance Director Additional verification helps to reduce our risks further. We have invested in our CRM system to ensure we can prevent duplicate records, bank details and other information from being entered.

Regular due-diligence reports are circulated to ensure we continue to monitor information; these are reviewed weekly.

All our account managers, Senior managers & the board of directors have attended a variety of seminars & Courses provided through our membership of Slave Free Alliance

High risk sectors

ALS supply temporary workers to sectors that are deemed to be high risk and targeted by gangs looking to infiltrate an organisation with victims of modern slavery. A substantial number of recent prosecutions and cases have involved warehouse and waste management facilities as well as recruitment agencies.

We recognise that the nature of the roles and the workforce typically used in these sectors means we are more likely to be targeted and therefore need to remain diligent. As such, we need to raise our standards to ensure we are not a 'soft target' by utilising a three-pronged approach:

Customer awareness

Increasing our customer awareness of the risks of modern slavery will help ensure we work collaboratively with them throughout our tenure. Completing joint assessments of the risk, concerns and methods of infiltration of the labour force. Completing collective welfare checks on the workforce and encouraging random dip-sampling and checking on the entire process of the candidate journey with ALS. Joint training sessions will also help encourage dialogue, shared learning and engagement on the topic. We continue to maintain a principle of transparency and a shared approach to eradicating Modern Slavery and have completed several positive projects with our customers in this regard.

Candidate awareness

We recognise that many victims do not recognise that they are indeed the victim of modern slavery or human trafficking, so we have increased our engagement with the workforce with specific 'Spot the Signs' campaigns and demystifying the language around modern slavery through simple, easy to understand and engaging literature, training and communication on our sites. Specific helplines for workers to report welfare concerns and proactive welfare interviews are regularly conducted by an impartial member of the ALS team.

Employee awareness

We have increased our focus on ensuring our recruiters and Account Managers ask open questions and understand the reason 'why' we do certain things in the way we do them. We also ensure they understand the implications of modern slavery and our approach to tackling it will help guarantee our culture remains consistent as we continue to grow.

To increase awareness, we have continued to utilise:

- Bespoke posters in multiple languages
- Confidential whistleblower hotline
- External audits from Slave Free Alliance and other organisations
- Toolbox Talks, seminars and training for all staff.
- Digital learning content
- Unannounced and random auditing

Fulfilment

We recognise that we work in hard-to-fill sectors and therefore we ensure regular engagement with our customers on the challenges of recruitment.

The effect of Brexit on the availability of temporary workers, alongside retirees and the change of roles through Covid-19 have made this one of the most challenging times in recruitment. Regular and structured dialogue with customers, working in partnership to adjust operations to ensure the best possible service in the circumstances has ensured we remain successful. Our customers recognise the challenges with recruitment and our best relationships are built on trust, a collaborative approach based on mutual respect, transparency and accountability.

We complete regular and proactive welfare checks with our workers as part of our modern slavery due diligence. This helps to raise awareness to our staff, provides a deterrent to potential gangs and provides an opportunity for early intervention in cases where we have concerns for the wellbeing of a colleague or worker.

These due diligence checks are completed by a senior member from our team, not directly involved in the running of the relevant contract, ensuring an impartial view to encourage dialogue from the workforce, whilst also protecting our business in the scenario of a 'good egg, gone bad' scenario, based on intelligence on cases involving other recruitment agencies.

Additional due diligence checks are completed with workers, either selected at random or based on system generated 'flags'. Flags could include shared bank account details, shared addresses or similar. These are often legitimate (student housing, cohabiting partners etc) but are seen as potential signs of victims of slavery.

Through this methodology, we successfully recovered a victim of modern slavery in January 2021, and this has gathered our efforts to look to recover more victims through increased engagement and awareness. Our proactive, transparent and joint approach with the client in this incident has helped to reinforce our belief that together we can eliminate modern slavery in all its forms.

During 2025, we were informed by an ALS Worker via an anonymous complaint related to workers at the Cory MRF in Wandsworth. ALS People commissioned Slave Free Alliance to investigate the complaint. Although Slave-Free Alliance found no indication of modern slavery at the site, since the incident, ALS have taken further measures to ensure the prevention of worker exploitation by other workers, including enhanced welfare checks and discussion forums with workers. The ongoing awareness delivered by ALS to its workers and staff were pivotal in a co-worker being able to spot the signs and alert senior managers of the event.

ALS continue to work proactively with Slave Free Alliance, increasing our engagement and creating bespoke training materials for our team to ensure we understand the potential risks and perform dynamic and proportionate checks on our workforce.

We have also taken the feedback from the gap analysis regularly performed by Slave Free Alliance and taken that forward to other customers, engaging earlier during any competitive tender process to understand their current policies and procedures and ensure they are aligned to our own. This has proven successful and ultimately supports our approach to responsible recruitment.

We have increased the questions we ask during welfare interviews, ensuring these reflect the latest insights and intelligence. Importantly, we recognised the skills needed to ask open questions, to leave pauses, to show empathy and compassion and to provide an environment for someone experiencing this level of oppression and threat to their wellbeing to disclose. We recognise that these soft skills are integral to achieving a positive outcome, and as such we intend to strengthen this training to our team so our due diligence checks are not just seen as a 'tick box' exercise.

The ongoing awareness delivered by ALS to its workers and staff were pivotal in a co-worker being able to spot the signs and alert senior managers of the event.

ALS made several commitments to increase our training over the last 3 years and have a specific focus on the soft skills element for 2026 and beyond. Our team find external sessions insightful, emotionally challenging and thought provoking.

Internal training

We have a programme of internal training including:

- Online learning course on modern slavery for all staff and temporary workers
- Slave Free Alliance training for both line managers and frontline colleagues.
- Tier 2 line managers are specifically targeted under agreed KPI's on completing spot checks, audits and interviews with the temporary workforce.
- Increased training on soft skills, interview techniques and emotional intelligence.

Given the complex and evolving nature of modern slavery risks—combined with continual changes within our industry and business—we regularly review our progress to ensure ongoing compliance and best practice. We do this in partnership with Slave-Free Alliance, whose advisers help us identify ways to strengthen our modern slavery risk identification and prevention programme, while keeping us informed of developments relating to the Modern Slavery Act. Supplier audits also provide valuable opportunities to discuss the issue with other businesses and learn from their approaches.

At ALS, employees receive regular training on how to identify and report concerns relating to modern slavery and human trafficking. Throughout 2025, we continued delivering training in partnership with Slave-Free Alliance for all ALS employees. Senior Board members also attended and engaged with frequent seminars hosted by Slave-Free Alliance and Stronger Together. The learnings from these sessions—combined with quarterly SFA reviews and customer specific gap analyses—support best practice evaluations of our current processes and guide the introduction of new and improved measures



Tracking our progress

In 2025, we committed to a series of actions to improve our awareness, policies and procedures in incorporating a broader approach to tackling modern slavery. Progress on those actions is outlined below:

Action	Progress	Next Steps
Expand our gap analysis from SFA & Stronger Together to include further customer locations.	Gap analysis now completed with 50% of ALS customers, including gap analysis and audit from Stronger Together & Slave Free Alliance	Annual rollout of gap analysis to further customers, feedback on areas of improvement from 2025 audits / gap reviews
We have expanded our literature and campaigns deployed on sites and aimed specifically at our workforce, who may not realise that they are at risk or indeed being exploited, ensuring they feel empowered to raise concerns about their wellbeing.	Posters and staff handbook updated with additional helplines and contact details	Harvest worker feedback to understand how the MS Agenda, messages and awareness campaigns are being received and understood.
Integrate modern slavery materials into induction pack across all sites	Integrated into worker handbook issued to all sites	Pre-employment questionnaire designed to assess new starters' understanding of the modern slavery process and verify that they possess the required level of awareness prior to assignment.
Improve access to confidential whistleblower helpline	Posters and staff handbook updated with additional helplines and contact details	Worker surveys to review receipt and understanding of the communications
Increase system-generated compliance checks to help target welfare interviews and checks	Increased frequency of checks and integrated into Quality Management Committee reviewed monthly Central Compliance function situated in our Head Office	Measure and report on number of welfare checks carried out, escalations and outcomes of any raised cases
Rollout a more interactive and immersive learning experience to our sites to raise further awareness	Pilot introduced, seeking support from subject matter experts to ensure the immersive element is effective.	Further content to be introduced in 2026

Posters

Our activity to help abolish modern slavery extends beyond educating our management teams and permanent employees. We have also created bespoke communications campaigns including eLearning videos, posters and booklets focused on supporting potential victims of modern slavery to recognise the signs of forced labour and exploitation and to reach out and seek help.

These posters are positioned in areas where they are most likely to be viewed by temporary workers such as on the back of toilet doors and in canteen areas. They feature information, advice and confidential helpline numbers for anyone with concerns.



eLearning

These eLearning videos are short, easy to understand and can be accessed either on a mobile phone or laptop. They are aimed at helping potential victims recognise the signs of slavery and exploitation with clear messaging and the modern slavery helpline number featured throughout.



The screenshot shows the Academii eLearning course interface for Modern Slavery. The course is titled "Modern Slavery" and is worth 150 points. It is a three-module course covering topics such as:

- What modern slavery is and the different types that exist
- The signs and indicators of the different types of modern slavery
- How to respond appropriately when a victim of modern slavery is identified

 The course content includes:

- Modern Slavery Session 1 (Completed)
- Modern Slavery Session 2
- Modern Slavery Session 3

 The completion rules are:

- All units must be completed
- Leads to a certificate with a duration of 3 years

Booklets

This pocket-sized modern slavery booklet was designed specifically for anyone to be able to quickly slip it into a pocket or bag. The booklet features information to help workers spot the signs to recognise whether they are at risk of or currently a victim of modern slavery and exploitation. There is advice for anyone with concerns detailed throughout the booklet including confidential helpline numbers.



ALS has commissioned a senior and experienced member in Ela Boryca Opie, who reports directly to the Board, to serve as the Champion for our Modern Slavery commitments. This role is focused on implementing robust welfare-engagement processes, providing clear reporting on the number of checks undertaken, documenting any issues identified, and tracking the associated corrective actions.

To reinforce understanding at the earliest stage, ALS is introducing pre-employment questionnaires to assess day-one awareness of modern slavery risks and responsibilities. Furthermore, ALS is developing a structured feedback forum to gather insight from both colleagues and workers regarding their understanding and engagement with our modern slavery procedures. This feedback will inform ongoing improvements and ensure our approach remains targeted, comprehensive, and aligned with best practice

We want to continue to challenge ourselves to be better, more proactive and ultimately help reduce the risks of modern slavery to our own business, our customers, our workers and our industries. To help further this, we have also committed to the following in 2026, Driven by the ALS MS Champion Ela Boryca-Opie.

- Joint awareness campaign and gap analysis/audits with customers
- Training with SFA booked for all staff in 2026.
- Rollout new staff handbook and poster pack to all sites
- Supply chain audits of 2nd tier recruitment agencies to have explicit sections on Modern Slavery as well as other forms of exploitation such as the usage of illegal or immoral payroll schemes.
- Promote a feedback program for ALS workers to ascertain the impact and understanding they have of the Modern Slavery agenda and ALS's processes of delivering the message, keeping workers safe, providing materials that are understood and methods of reporting / raising concerns
- Extend our collaborative GAP analysis with more customers to continuously improve our application and diligence to our processes.



ALS has commissioned a senior and experienced member in Ela Boryca-Opie, who reports directly to the Board, to serve as the Champion for our Modern Slavery commitments

**This Modern Slavery Statement
has been approved by the Board
of Directors and signed by
Steve Lanigan, Chairman on
17/03/2026.**

The policy was developed in consultation with Slave-Free Alliance and is informed by the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance

