

MODERN DAY SLAVERY POLICY

APPROVAL CONTROL

ROLE	NAME	DATE
Chief Technology & Risk Officer	Steve Mills	29/06/2016

VERSION CONTROL

VERSION	AUTHOR NAME	VERSION CHANGES	DATE
0.1	George Lock	Formation of Policy	03/03/2016
0.2	George Lock	Amends following review	07/03/2016
0.3	Jayne Morris	Review	09/03/2016
0.4	George Lock	Amends following review	10/03/2016
0.5	Jayne Morris	Review and amendment	16/03/2016
0.6	George Lock	Amends on Huntswood standards	24/03/2016
0.7	Jayne Morris	Minor amends	31/03/2016
0.8	Jayne Morris	Amendments to bring the draft in line with Huntswood's policy template	14/06/2016
0.9	Steve Mills	Review and minor amends	30/06/2016
0.91	Gail Lawrence	Amend to Section 2	21/07/2016
1.0	Mark Humphries	Reviewed and signed off	21/07/2016
1.01	Jayne Morris	Annual review of policy – not changes	12/09/2017
1.02	Jayne Morris	Annual Policy review – no changes	31/08/2018

1.03	Jayne Morris	Amend to CEO	04/02/2019
1.04	Jayne Morris	Review with Supplier Contracts Manager to update to current procurement process	30/09/2019
1.05	Jayne Morris	Amendment to reflect policy relevant to Huntswood CTC Ltd	01/10/2019
1.06	Jayne Morris	Footer revision (Version control, review date and owner)	01/10/2019
1.07	Jayne Morris	Updated to incorporate Huntswood subsidiaries	06/01/2020

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INTRODUCTION

The Modern Day Slavery Act 2015 ('the Act') requires businesses with revenue totalling £36m or more to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains. Disclosures are intended to provide consumers with the ability to make better, more informed choices about the products and services they buy and companies they support.

Huntswood CTC Ltd and its respective subsidiaries ("Huntswood" or "Group") shall produce a statement and display it on our website detailing actions the business has taken to ensure slavery and human trafficking are not present within our operation and supply chain.

APPLICABILITY

The Modern Day Slavery Policy is owned by Huntswood's CEO and applies to permanent, temporary and fixed term employees of Huntswood ('Huntswood Representatives') and suppliers to Huntswood.

Huntswood expects all suppliers to address the issues of slavery and human trafficking in their supply chains and publish their own statement (where required).

POLICY STATEMENT

Huntswood endeavours to ensure that slavery and human trafficking are not present within our workforce or supply chains. Furthermore, Huntswood is committed to increasing transparency within its supply chain and wider business practises. People are integral to the foundation of Huntswood and thus the business holds our leadership, representatives, suppliers and partners to the highest ethical standards.

PRINCIPLES

1. SUPPLY CHAIN - ENGAGEMENT AND GOVERNANCE

- 1.1. Huntswood is committed to upholding and exceeding the highest ethical and social standards within the work place. We expect our suppliers to mirror these views. Products or services provided to Huntswood should be compatible with the values that contribute to Huntswood's reputation. As a result Huntswood will not support or engage with any suppliers knowingly involved in slavery or human trafficking. Where possible, Huntswood seeks to build longstanding relationships and adopt a partnership approach to supplier engagement and management.
- 1.2. Ensuring Huntswood is not supporting modern slavery and human trafficking is vitally important to the business. Since the introduction of the Act, Huntswood has developed and undertaken risk profiling for each of our suppliers, enhanced by our knowledge of their operations and practice, based on:
 - **Risk of violating social and environmental issues**
High risk if:
 - The supplier is located in a country where respect for human rights and labour standards is low and where the enforcement of environmental

standards is similarly low or the products they supply are produced in these countries.

- The supplier is used by sectors employing large numbers of low-paid workers and hazardous materials or scarce natural resources
- The supplier employs migrant and/or seasonal workers.
- **Commercial relevance**

High risk if:

- We undertake a significant level of business with the supplier
- The supplier is the sole supplier and would be difficult and time-consuming to replace

Where a supplier is also under obligation to provide a statement in line with the Act, and this declaration is sufficient (i.e. steps are being taken to identify and address modern slavery and human trafficking), Huntswood will not investigate further. Should a supplier provide a statement which we judge to be insufficient or are not required to make a statement, more detailed evidence will be sought to enable Huntswood to understand the measures they have taken in respect of their supply chain.

- 1.3. Huntswood has a detailed due diligence process, including supplier pre-screening. This process ensures that supplier contracts contain adequate contractual protection, including warranties, reporting requirements and audit rights., reducing the risk of modern slavery and human trafficking in the supply chain.
- 1.4. Renewal terms for exiting suppliers are also subject to similar rigors of new supplier selection.

2. EMPLOYEE AND ASSOCIATE ENGAGEMENT AND GOVERNANCE

People are integral to Huntswood's operation and there are a number of policies and processes designed to protect the rights of our workers. We value our culture of trust where everyone is treated fairly and where people's rights are honoured.

Quality assurance process and vetting

Huntswood has a stringent quality assurance process for the engagement of all of our employees and associates.

All employees and associates go through multiple integrity checks prior to engagement including:

- Identity
- Credit
- Criminal record
- Qualification
- Limited company
- Employment history

- Right to work

Associates are engaged through a contract for services. Where they are engaged via an Umbrella company, a due diligence exercise is performed to ensure that they adhere to appropriate legislation which includes human rights and slavery.

Pay and benefits

Huntswood and its suppliers must remunerate workers, paying at least the national minimum wage required by law. Employee benefits which include pension provision are provided after an individual's three month probationary period ends.

Under the EU Working Time Directive, all employees have the right to work no more than 48 hours per week. However, all employees also have the right to opt out of such arrangement.

POLICY GOVERNANCE

Huntswood's CEO owns the [Corporate Social Responsibility Policy](#) and associated ethical culture initiatives. The Company's culture is values led which is driven by senior management.

Due to the nature of the work Huntswood carries out, we consider the likelihood of modern-day slavery or human trafficking occurring in our operation to be very low risk. This, in conjunction with representative communication throughout the year significantly reduces the risk of failing to comply. Employees are encouraged to raise ethical questions and concerns and have multiple channels to do so anonymously, if they prefer and Huntswood's [Whistleblowing Policy](#), setting out the policy and approach, can be found on the Vault.

POLICY RESPONSIBILITIES

RESPONSIBILITY	ROLE	DEFINITION
Owner	CEO	The Owner ensures the policy is reviewed and maintained on a regular basis
Reviewers	Risk Director Head of Legal Head of HR	Reviewers ensure the policy stays up to current and if necessary, updated annually.
Author	Head of Infrastructure	The author is responsible for updating the policy document in a succinct time frame on receiving updates from the reviewer and in accordance with company policy writing guidelines.
Policy Audience	All Huntswood representatives	Must apply the business policy to the business they undertake on behalf of The Company

TABLE OF DEFINITIONS

The table of definitions provides definitions of terms used within the policy document

TERM	DEFINITION
Huntswood Representative	Anyone who works for or on behalf of Huntswood.
Supplier	As part of a commercial relationship, a supplier is a person or entity that is the source for goods or services. A supplier should be a business that always behaves in the right manner and can be trusted to deliver on their promises to protect their interest and ours.
Slavery and Servitude	<p>Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.</p> <p>The Home Office (2015) <i>Modern Day Slavery Act 2015</i>. Available at: http://www.legislation.gov.uk/ukpga/2015/30 (Accessed 11/03/2016)</p>
Human Trafficking	<p>An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.</p> <p>The Home Office (2015) <i>Modern Day Slavery Act 2015</i>. Available at: http://www.legislation.gov.uk/ukpga/2015/30 (Accessed 11/03/2016)</p>
Forced or Compulsory Labour	<p>Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.</p> <p>The Home Office (2015) <i>Modern Day Slavery Act 2015</i>. Available at: http://www.legislation.gov.uk/ukpga/2015/30 (Accessed 11/03/2016)</p>

REFERENCE MATERIALS

Policies supporting this statement include:

- [Whistleblowing Policy](#)
- [Corporate Social Responsibility Policy](#)