

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”).

Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

The HF Group is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners.

Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

Whilst recognising our statutory obligations, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To demonstrate our compliance, we have implemented the following:

- Assessed which parts of our business and which of our suppliers are most at risk of modern slavery, so that efforts can be focused on those areas.
- Engaged with our suppliers both to convey to them our Anti-Slavery Policy and to record the measures taken by them, to eliminate modern slavery in their businesses.
- Where appropriate, we have introduced supplier and subcontractor pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
- Introduced contractual provisions for our suppliers and Subcontractors to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- Issued guidance to our employees, on recognising the signs of Modern Slavery, and how to safely report any suspicions.

HF Group since 2016 have revised and published this Modern Slavery and Human Trafficking statement, to coincide with our annual financial statement (March 31<sup>st</sup>). This statement is posted on our Company Website.

**RESPONSIBILITY FOR THE POLICY** Ultimate responsibility for the prevention and prevention of modern slavery rests with The HF Group Board of Directors. Managers and supervisors at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

#### ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Team members should approach either their Unit Manager or the Head of Human Resources. If the matter is extremely serious then a director of the Company should be approached.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

#### COMMUNICATION AND AWARENESS OF THIS POLICY

The HF Groups approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Signed:



Group Managing Director

Date: 4<sup>th</sup> April 2019