

**Anti-slavery and Human Trafficking Policy**

## 1.0 Revision History

<b>Revision Date</b>	<b>Version</b>	<b>Summary of Changes</b>	<b>Author</b>
January 2024	0.1		David Hankin
February 2024	1.0	Approved by Board	David Hankin
February 2025	2.0	Approved by Board	David Hankin
February 2026	3.0	Approved by Board	David Hankin

## 1. Policy statement

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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. Hargreaves Services plc and its subsidiaries (**Group**) is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and, in our standard terms and conditions for suppliers, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3. The subsidiaries covered by this policy statement include but are not limited to: Hargreaves Industrial Services Limited; Hargreaves (UK) Limited; Blackwell Earthmoving Limited; Hargreaves (UK) Services Limited; S&B Utilities Limited; C.A Blackwell (Contracts) Limited; Hargreaves Land Limited; Hargreaves Waste Management Services Limited; Hargreaves Trading Limited; Hargreaves Industrial Services (HK) Limited; Hargreaves Power Services (HK) Limited; Access Services (HK) Limited; Hargreaves Services South Africa (Pty) Limited; and Hargreaves Industrial Services Sdn Bhd.

## 2. About this policy

- 2.1. The purpose of this policy is to:
  - 2.1.1. set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
  - 2.1.2. provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.
- 2.2. This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **workers** in this policy).

- 2.3. This policy does not form part of any worker's contract of employment and we may amend it at any time.

### **3. Responsibility for the policy**

- 3.1. The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2. The Compliance Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 3.4. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Officer.

### **4. Your responsibilities and how to raise a concern**

- 4.1. You must ensure that you read, understand and comply with this policy.
- 4.2. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3. You must notify your manager or the Compliance Officer (using the contact details in paragraph 7 of this policy) as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.
- 4.4. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.5. If you believe or suspect that a breach of this policy has occurred or that it may occur you must notify your manager or the Compliance Officer or report it in accordance with our Whistleblowing Policy (available on Sharepoint or the Group website at <https://www.hsgplc.co.uk/responsibility/group-policies/>) as soon as possible. Contact details are provided in paragraph 7 of this policy.
- 4.6. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Compliance Officer or through the confidential whistleblowing helpline using the details in paragraph 7 of this policy.

- 4.7. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. 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. If you believe that you have suffered any such treatment, you should inform your manager or the Compliance Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## **5. Training and communication**

- 5.1. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 5.2. Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

## **6. Breaches of this policy**

- 6.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **7. Contacts**

Compliance Officer

Whistleblowing Hotline  
Operated by Safecall Limited

General Counsel & Company Secretary

0191 373 4485

0800 915 1571 – UK  
00 800 7233 2255 – Germany  
3077 5524 – Hong Kong  
0800 990 243 – South Africa