

	Anti-Slavery and Human Trafficking Policy	Issue date: 02-Oct-18 Revised date: 02-Oct-19
Doc No: HSG	Author : Directors	Issue No : 1

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY 2016-2017

OWNER: Directors

Signature: A.Govier

Even though we HSGFM are a small business we try to maintain relationships with many different organisations in its supply chain, as well as employing directly. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains. The policy below underpins our approach,

HSGFM has adopted a statement of our corporate value on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all or who have, or seek to have, a business relationship with HSGFM to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery value.

HSGFM Ltd ANTI-SLAVERY VALUE

As part of our culture of good governance for good business, HSGFM operates to a set of core values which reflect our relationships with our principal stakeholder groups: customers, suppliers and team members. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

Our attitude to modern slavery is: zero tolerance.

1. PURPOSE OF THIS POLICY

1.1 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. This document sets out the policy of HSGFM (the “Company”) with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

1.2 As a Company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our 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 businesses or those of our suppliers.

2. STEPS FOR THE PREVENTION OF MODERN SLAVERY

2.1 We are 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

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under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

2.2 All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.

2.3 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:

- (i) engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- (iii) introduce contractual provisions for our suppliers 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.

3. RESPONSIBILITY FOR THE POLICY

3.1 Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The Managing Director of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

3.2 Team leaders 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.

4. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Whistleblowing Procedure – direct access to senior leadership The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees and may be found in the company quality manual.

In summary, team member should approach the Managing Director. If the matter is extremely serious then a director of the Company should be approached. The nature of the complaint will determine the Company's next course of action.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

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Our zero-tolerance 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.

7. REVIEW

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company Director on a regular basis (at least annually) and may be amended from time to time.