



Modern Slavery Policy

This policy sets out **HCT Group's** policy on combatting forced labour in our business and in our supply chain. The term forced labour used in this policy includes slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

We have adopted this policy as part of our larger commitment to encourage ethical, social and environmental responsibility, which includes the following policies: Anti Bribery Policy, Recruitment and Selection Policy, CSR policy; environmental policy.

We oppose the use and exploitation of forced labour and we expect all those who work for us or on our behalf to share our zero-tolerance approach.

This policy applies to all those who work for us and those who work on our behalf, including employees, agency workers, casual and freelance staff.

Why combatting forced labour matters

1. Forced labour is a global problem. It affects over 20 million people around the world. Taking steps to tackle forced labour protects vulnerable workers and helps prevent human rights violations.
2. We do not tolerate forced labour within our business. Eradicating forced labour is consistent with our ethical principles and is important to protect our reputation, sustain investor and consumer confidence and secure our commercial position.

Our responsibilities

3. The HCT Group Executive Board is responsible overall for ensuring that this policy and our annual slavery and human trafficking statement (see below) comply with our legal and ethical duties.
4. The Chief Finance Officer has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, answering queries on it and auditing internal processes aimed at ensuring that forced labour is not taking place in our business or our supply chains. The Chief Finance Officer is also responsible for preparing the annual statement and presenting it to the Board for approval.
5. The Modern Slavery Act 2015 requires commercial organisations over a certain size to publish a slavery and human trafficking statement each financial year, disclosing the steps an organisation has taken to ensure that slavery and human trafficking is not taking place in its supply chain or its business. Our statement is published on the home page of our website and should be read in conjunction with this policy.

What we are doing

6. We are confident that we employ no forced labour directly within our business. However, we regularly review that and also assess our supply chain with a view to ensuring that there is no use of forced labour within the supply chain.
7. We take the following steps to prevent, evaluate and address risks of forced labour in our supply chain:

- (a) We have established a Supplier Code of Conduct (see Annex 1) with which we expect our suppliers to comply. We may impose contractual obligations requiring compliance;
 - (b) We review our supply chains annually to evaluate forced labour risk and, if a risk is identified, we take appropriate steps to address it; and
 - (c) We consider the conduct of each supplier against the Supplier Code of Conduct when awarding and/or renewing business with the supplier.
8. We train personnel working with our supply chain on forced labour and the Supplier Code of Conduct, with a view to reducing the risks of forced labour in our supply chain.

Employee responsibilities

9. Managers are responsible for ensuring that this policy is applied within their area of responsibility.
10. Our employees are expected to be alert to any indicators of forced labour in our business or supply chain.
11. We do not tolerate any forced labour within our business. If you suspect that there has been a breach of this policy or if you have any concerns regarding the issue of forced labour in any part of our business or our supply chain, you should notify your manager or the Chief Finance Officer and report it in accordance with our Whistleblowing policy as soon as possible.

Monitoring our effectiveness

12. We will review this policy to ensure that it is operating effectively. Where concerns have been raised through this policy, we will consider how they have been handled and if appropriate follow up action has been taken.

Status of this policy

13. This policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended by us at any time.



ANNEX 1

SUPPLIER CODE OF CONDUCT

FORCED LABOUR

HCT Group opposes the use and exploitation of forced labour. We expect all those who work for us or on our behalf to share our zero-tolerance approach.

References in this Code to “forced labour” include slavery, servitude and any type of forced or compulsory labour as well as trafficking for the purposes of exploitation.

Accordingly, our expectations of suppliers are as follows:

1. Suppliers must not use forced labour.
2. If requested by us, suppliers will complete a self-assessment questionnaire provided by us regarding the use of forced labour and the steps they have taken to ensure that neither they nor their supply chain make use of it. Suppliers will provide us with a copy of the completed questionnaire.
3. Suppliers will allow us to audit compliance with this Code by inspecting their facilities, reviewing records, policies and practices and interviewing personnel. Suppliers are expected to provide prompt access to their facilities, records, documentation and personnel.
4. If we identify any non-compliance, suppliers must prepare, permit us to review and execute an improvement plan approved by us to rectify matters.
5. Suppliers will place similar expectations to those set out above on their own suppliers.

We may require compliance with this Code of Conduct in our contracts with suppliers and may also require that they impose equivalent obligations on their own suppliers.

Subject to any contractual terms, we may terminate our supply relationship if a supplier fails to comply with this Code of Conduct. If appropriate, we may report any breach of the Code of Conduct to the appropriate authorities.

If you have any concerns, or are aware of any suspected violations of this Code of Conduct, please notify John Smart Chief (Finance Officer) or Darren Rees (Group Head of People and Talent immediately).