



## Modern Slavery and Human Trafficking Policy

### Policy statement

Hartland Group Ltd (the Organisation) is dedicated to preventing modern slavery and human trafficking in all aspects of our operations and supply chain. We recognize the importance of ethical practices and are committed to ensuring that all our activities comply with the Modern Slavery Act 2015. This policy outlines the steps Hartland Group is taking to address and mitigate risks associated with slavery and human trafficking, reflecting our commitment to transparency and integrity.

### Our Approach to Modern Slavery

Hartland Group implements robust measures to minimize the risk of modern slavery in our business and supply chain. These measures include:

- a) Ensuring fair and ethical recruitment practices.
- b) Promoting awareness and understanding of modern slavery among employees and suppliers.
- c) Conducting regular assessments and audits of our supply chain to identify and address potential risks.

### Policies and Procedures

Hartland Group has established a comprehensive framework of policies to prevent modern slavery and human trafficking. Key policies include:

- a) ***Equality & Diversity Policy:*** Promotes a culture of inclusion and respect.
- b) ***Recruitment Policy:*** Ensures transparent and ethical hiring practices.
- c) ***Procurement Policy:*** Emphasizes responsible sourcing and supplier compliance.
- d) ***Whistleblowing Procedure:*** Provides a safe and confidential mechanism for reporting concerns.

### Code of Conduct

Our Code of Conduct forms the foundation of our ethical practices. It serves as a guide for employees and partners, emphasizing our commitment to respect, fairness, and accountability. Employees are trained to recognize and address potential risks of modern slavery within their roles.

### Supply Chain Standards

We expect our suppliers and contractors to uphold the same ethical standards that we maintain. We expect our suppliers and other business partners to have the same high standards as we impose on our own business. We actively promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain.



Suppliers must:

- a) Complete a supplier questionnaire prior to approval to our supplier list. These questionnaires, once completed, are checked to ensure compliance to the Modern Slavery Act.
- b) Complete a due diligence process, including acknowledgment of our Supplier Code of Conduct, Social Value Guidance and Modern Slavery Act. These documents set out key requirements that we expect from our suppliers including amongst other things, mitigation of risks associated with slavery and human trafficking.
- c) Participate in periodic audits and provide evidence of compliance when requested.
- d) Standard Terms and Conditions require our suppliers to comply with all legal requirements, including adherence to the Modern Slavery Act.

### **Risk Assessment and Due Diligence**

Hartland Group evaluates supply chain risks based on factors such as geographic location, industry practices, and labor conditions. With the introduction of the Modern Slavery Act, we assessed our supply chain for potential areas of increased risk of non-compliance to the Act. We continue to do this and, where areas are identified, we carry out an audit, which will include a focus on compliance with employment as well as other regulatory and sustainability criteria. We prioritize:

- a) High-risk sectors that rely on low-skilled labor.
- b) Suppliers operating outside regulated markets.
- c) Continuous engagement with suppliers to improve compliance.

### **Training and Awareness**

We believe in empowering our employees and partners with knowledge to identify and combat modern slavery. Regular training sessions are provided to:

- a) Educate employees about modern slavery and its risks.
- b) Equip them with tools to report suspicious activities.
- c) Ensure suppliers understand their responsibilities under the Modern Slavery Act.

The improved awareness is one of our most effective methods to reduce the risk of modern slavery and with the help of both our employees and suppliers we aim to ensure that there are no opportunities to hide forced labour within our organisation or our supply chain.

### **Reporting and Whistleblowing**

Hartland Group is committed to fostering an open and transparent environment. Our whistleblowing procedure provides our employees, customers, and suppliers encouragement to report any concerns related to modern slavery through our confidential whistleblowing channels. All reports are treated seriously and investigated promptly without fear of retaliation.



In addition, employees who believe that they have come across an instance of modern slavery (or who may be a victim) and who need information and/or guidance on remedy, compensation and justice will be advised of their right to contact the Modern Slavery Helpline and/or other specialist support and assistance providers across the UK.

### **Monitoring and Improvement**

We continually review the effectiveness of our policies and processes to combat modern slavery. Key performance indicators (KPIs) are monitored to measure how effective we have been in communicating awareness of our core policies and procedures related to the requirements of the Modern Slavery Act, and our other actions to seek to ensure that slavery and human trafficking is not taking place in any of our businesses or supply chains. The KPI's used to measure against will be subject to ongoing review by the Directors to ensure their continued effectiveness.

### **Commitment to Ethical Practices**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Hartland Group Ltd's modern slavery and human trafficking policy as approved by the Board of Directors.

**Name** Roderick Brobbey

**Role** Director

**Date** 24/01/2025

**Signed** 