

Modern slavery statement for financial year 2019/20

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that The Huntercombe Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Huntercombe Group has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Modern Slavery policy** - This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Recruitment and Selection and Legality to Work in the UK policies** - We operate a robust recruitment procedures, including conducting eligibility to work in the UK checks (prior to employment commencing and during employment when a re-check is required), for all employees to safeguard against human trafficking or individuals being forced to work against their will. Dignity at Work policy – we are committed to creating a culture and work environment, which is free from bullying, harassment and victimisation, where everyone is treated with the utmost dignity and respect. The Company will not tolerate bullying, harassment or victimisation of any kind and any behaviour that undermines this aim is totally unacceptable
3. **Equality and Diversity policy** - We are committed to ensuring equality of opportunity for all employees irrespective of age, disability, sex, gender reassignment, sexual orientation, race, religion or belief, marital status and civil partnerships and aims to ensure all that all managers, employees and contractors are made fully aware of the behaviour that is and is not acceptable within the business.
4. **Whistleblowing policy** – We operate a robust policy and confidential hotline to ensure all employees know that they can raise concerns confidentially about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Business Conduct Policy. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
5. **Anti-Bribery and Anti-Corruption Policy** - This policy exists to set out the responsibilities of THG and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for THG. It helps them recognise and deal with bribery and corruption issues and understand their responsibilities.

Our suppliers

The Huntercombe Group operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery . Our Modern Slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light]

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Valerie Michie

CEO