

MODERN SLAVERY ACT POLICY

HS1 LIMITED

1. ABOUT THIS POLICY

We have a zero-tolerance approach to modern slavery and 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 business or in any of our supply chains.

2. WHO MUST COMPLY WITH THIS POLICY?

This policy applies to all suppliers, contractors and other business partners, and sets out the standards that we require of the businesses that we choose to work with.

3. WHAT IS SLAVERY AND HUMAN TRAFFICKING?

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. Modern slavery occurs across the globe – including the UK – and in all markets.

4. WHAT DO WE REQUIRE FROM OUR SUPPLIERS?

4.1 We take seriously our reporting obligations under the Modern Slavery Act 2015. Accordingly, we are committed to maintaining high ethical standards in our own business and promoting transparency and best practice in our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. Similarly, we expect that our suppliers will hold their own suppliers to the same high standards.

4.2 In particular (but without limitation), we require you to comply with the following:

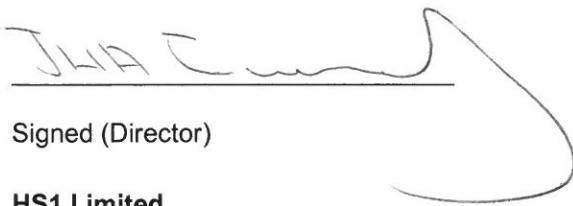
- (a) If your business is itself required to comply with the supply chain transparency reporting provisions in the Modern Slavery Act 2015, then we expect you to take that requirement seriously and to devote an appropriate amount of time and resources to it;
- (b) Be aware that the use of temporary and contract labour carries additional risk. Accordingly, we expect our suppliers only to use providers of temporary and contract labour who are able to demonstrate compliance with the requirements of the Modern Slavery Act 2015. In particular, processes should be in place to ensure that individual workers are signing up to work voluntarily and are not being controlled by others to any extent;
- (c) There is also an increased risk of modern slavery and human trafficking taking place in certain territories and in connection with the supply of certain goods and raw

materials. We expect our suppliers to be sensitive to these increased risks and to modify their policies and processes accordingly;

- (d) We expect our suppliers to adopt modern slavery policies which mirror the requirements of this policy. For example, you should adopt supplier selection processes which aim to identify those businesses who are not capable of meeting the standards required. Similarly, we expect you to monitor existing suppliers so that you are alerted early to the risk of non-compliance with your policies;
- (e) We expect you to adopt a culture of compliance within your organisation, with the aim of raising standards year-on-year.

5. COMPLIANCE WITH THE POLICY

- 5.1 You must ensure that you read, understand and comply with this policy. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.2 You are required to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain (of any supplier tier) at the earliest possible stage. If you believe or suspect that slavery or human trafficking has occurred or that it may occur you must notify your contact at HS1 as soon as possible.
- 5.3 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 chain constitutes any of the various forms of modern slavery, please raise this with us for discussion.
- 5.4 We aim to encourage openness and will support any suppliers who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 5.5 We reserve our right to terminate our relationship with any supplier who breaches this policy with immediate effect.



JWA

Signed (Director)

HS1 Limited

Date: 28 September 2016