

## **HOYER UK Ltd – MODERN SLAVERY POLICY**

### **A. POLICY INTRODUCTION & STATEMENT**

1. Modern slavery and human trafficking are abhorrent practices that still exist in many parts of the world, including the UK. HOYER UK welcomes the UK Government's introduction of the Modern Slavery Act 2015. 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.
2. Our vision is to be an organisation that is trusted and respected as a business, where people are treated fairly wherever they are in our company or supply chains. Therefore we have a zero tolerance approach to modern slavery and 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. This policy sits under and within the Guiding Principles of the HOYER Group and our Code of Conduct.
3. We are also 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 under the Modern Slavery Act 2015. We expect the same high standards from all of our suppliers, contractors, sub-contractors and other business partners, and as part of our procurement and contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers, contractors and other business partners will hold their own suppliers to the same high standards.
4. This policy applies to all persons working for us or under our control or on our behalf in any capacity, including employees at all levels, agency workers, seconded workers, volunteers, contractors and sub-contractors, suppliers, external consultants, third-party representatives and other business partners.

### **B. RESPONSIBILITY FOR THE POLICY**

1. The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
2. The Company Secretary has primary and day-to-day responsibility for implementing this policy, making people aware of it, ensuring appropriate training is provided, monitoring its use and effectiveness, dealing with any questions about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
3. Management 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 in supply chains.
4. Everyone is invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and questions are encouraged and should be addressed to the Company Secretary at its registered office: HOYER UK Ltd, 517 Leeds Road, Huddersfield, HD2 1YJ.

### **C. COMPLIANCE WITH THE POLICY**

1. All employees must ensure that they read, understand and comply with this policy.
2. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control, or on our behalf. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
3. Employees must notify the Company Secretary at its registered office as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
4. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains, or with any of our suppliers, contractors, sub-contractors and other business partners at the earliest possible stage.
5. If an employee believes or suspects a breach of this policy has occurred or that it may occur they must report this to the Company Secretary OR report it in accordance with our Whistleblowing Policy as soon as possible. Employees should note that where appropriate, and with the welfare and safety of affected workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
6. If any employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any part of our supply chains constitutes any of the various forms of modern slavery, it should be raised with their line manager in the first instance.
7. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, termination of supplier or contracted arrangements, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Company Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

### **D. COMMUNICATION AND AWARENESS OF THIS POLICY**

1. Providing awareness regarding this policy, and of the risk our business faces from modern slavery in its supply chains, will form part of the induction process for all individuals who work for us, and training will be provided as necessary.
2. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, sub-contractors, and business partners and at the outset of any new business relationship and reinforced as appropriate thereafter.
3. Our requirements and expectations are included in all contracts for goods and services, all procurement processes, tenders and requests for prices issued.

**E. BREACHES OF THIS POLICY**

1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
2. We may terminate our relationship with suppliers, contractors, sub-contractors, other business partners, or any other individuals or organisations, working under our control, or on our behalf, if they breach this policy

**F. MEASUREMENT AND MONITORING**

1. Appropriate measurement and monitoring systems exist to ensure compliance with the policy and our expectations regarding modern slavery.
2. Performance will be reviewed by the Board at least annually and more frequently if necessary.
3. All reports and cases will be recorded and investigated. They have the same status and are subject to the same processes as a SHEQ Main Incident.

Andreas Reinhardt  
Managing Director  
HOYER UK Ltd