

A NOTE FROM HCD

It remains an unfortunate fact that Human Trafficking and Slavery remains a global crime affecting individuals and businesses worldwide

As a business, we must ensure we do everything we possibly can to prevent exploitation and human trafficking. It is paramount that all of our staff are well advised of the risks that exist, and it is important that they remain vigilant to such issues and risks at all times.

As a company, we remain fully committed to ensure that there is no Slavery or Human Trafficking in any element of our business. Our Policy on the matter ensures that we are providing effective controls in order to eliminate any risk. This highlights our pledge to act ethically and with integrity.

1.0 POLICY

HCD Ltd maintains relationships with many different organisations in its supply chain, as well as employing directly large numbers of people including the use of agency staff. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains.

HCD Ltd has adopted a statement of our corporate value on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all or who have, or seek to have, a business relationship with HCD Ltd, to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery value.

HCD Ltd.'s anti-slavery value:

As part of our culture of good governance for good business, at HCD Ltd we operate to a set of core values which reflect our relationships with our Managing Directors, customers, suppliers, and staff. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

2.0 PURPOSE OF THIS POLICY

- 2.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of HCD Ltd with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” as the meaning given in the Act.
- 2.2 As a company, we have a zero-tolerance approach to modern slavery. 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 businesses or those of our suppliers.

3.0 STEPS FOR THE PREVENTION OF MODERN SLAVERY

- 3.1 We are 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 our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.
- 3.2 All members of staff have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all staff’s obligations under their contract of employment.
- 3.3 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:
- Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
 - Engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.

- Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- Utilise labour and payroll monitoring systems.
- Only use reputable recruitment agencies complying with all applicable laws.
- Regularly review all staff and sub-contractors working for us.

If any business that we work with does not meet our required standards, we will take action so that they improve their position to allow them to work with us in the future.

- 3.4 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.

4.0 RESPONSIBILITY FOR THE POLICY

- 4.1 Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Managing Directors of the Group of Companies has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.
- 4.2 The management structure, including Directors, Heads of Company, Senior Managers, and Supervisors 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.

5.0 ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

5.1 Whistleblowing procedure – direct access to senior leadership

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to employees and may be found in the company's Integrated Management System (IMS).

5.2 Direct communication

The Company encourages members of the public or people not employed by us to write, in confidence, to the Quality and Compliance Manager at our Head Office to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

6.0 SAFEGUARDS

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, or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

7.0 COMMUNICATION AND AWARENESS OF THIS POLICY

Our zero-tolerance approach to modern slavery and human trafficking must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

8.0 REVIEW

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed and / or amended by the Managing Directors at least annually.

Signed:



Ian Musto
Managing Director

Date 10/01/2026