



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

DIRECTOR RESPONSIBLE: Roy Harding, Procurement Director

EFFECTIVE DATE: 19/09/2023

LATEST REVISION DATE: 15/10/2024

VERSION NUMBER: 3

RELEVANT SDGS: 4, 8 & 17

Hazel 4D is committed to respecting and protecting the rights of all individuals, and to preventing and combating slavery and human trafficking in all its forms. We recognise that slavery and human trafficking are serious crimes that violate the fundamental human rights of individuals, and we are committed to taking all reasonable steps to ensure that our business and supply chain are free from these practices.

The UK has a strong legal framework in place to combat slavery and human trafficking, including the Modern Slavery Act 2015 and the Human Trafficking and Exploitation (Scotland) Act 2015. These acts establish criminal offenses of slavery, servitude, forced or compulsory labour, and human trafficking, and provide for enhanced protection and support for victims.

In addition to these legal measures, the UK government has also implemented several policies and initiatives to prevent and combat slavery and human trafficking. For example, the UK has established the National Referral Mechanism (NRM) to identify and support victims of human trafficking and has established a Joint Slavery and Human Trafficking Analysis Centre to coordinate the response to slavery and human trafficking across law enforcement agencies.

SCOPE OF APPLICATION

This Anti-Slavery & Human Trafficking Policy applies to all of the company's operations and activities, both in the UK and internationally. This policy applies to all employees, contractors, and other stakeholders who are involved in the company's operations and activities, including but not limited to suppliers, customers, and local communities.

This policy applies to all forms of slavery, including but not limited to forced labour, debt bondage, and human trafficking. It also applies to all forms of exploitation, such as child labour and the abuse of vulnerable workers and as such is supported by our Child Labour Policy.

This policy is subject to review and update on a regular basis to ensure that it reflects the latest developments in the fight against slavery and exploitation, and to ensure that it aligns with the company's commitments and responsibilities.



RESPONSIBILITIES

The senior management team are responsible for the overall implementation and enforcement of this policy including the ongoing development and implementation appropriate strategies and initiatives.

Each business unit is responsible for ensuring that its operations and activities are in compliance with this policy, and for implementing and enforcing the policies and procedures necessary to achieve this compliance.

All employees and contractors are responsible for adhering to this policy, and for reporting any potential violations or non-compliances to their line manager. The company will provide training and guidance to employees, suppliers, and contractors on the requirements of this policy and will hold them accountable for their actions in relation to the policy.

OBJECTIVES

We will not tolerate any form of slavery or human trafficking in our business or supply chain, and we will take all necessary steps to prevent, detect, and report any such practices. We will cooperate with relevant authorities to ensure that perpetrators of these crimes are brought to justice.

We will conduct due diligence on our supply chain to identify and assess the risk of slavery and human trafficking, and we will implement measures to mitigate any identified risks (see Sustainable Procurement Policy). We will also require our suppliers to comply with our Anti-Slavery & Human Trafficking Policy and to take all reasonable steps to ensure that their own supply chains are free from slavery and human trafficking.

We will provide training to our employees on the issues of slavery and human trafficking, and we will encourage them to report any concerns or suspicions of these practices. We will also make information about our anti-slavery policy available to our employees and other stakeholders, and we will review and update this policy annually to ensure that it reflects our commitment to preventing and combating slavery and human trafficking.

Due to the strength of the UK's legal position in relation to anti-slavery as noted above, our core aims are to maintain compliance and enforcement of these across all activities identified in the scope of application. To support these efforts, we will:

- take steps to ensure that our supply chains are free from slavery and human trafficking,
- conduct supply chain risk assessments (see sustainable procurement policy),
- implement due diligence processes,
- train employees on how to identify and report suspected cases of slavery or human trafficking.

QUANTITATIVE TARGETS

- By the end of 2024 100% of our high-risk suppliers will be assessed for slavery and human trafficking risks within the next 12 months, and all new suppliers will be assessed in relation to their regional risk status before entering a business relationship with us.
- By the end of 2024 training on modern slavery and human trafficking will have been offered to at least 80% of our high-risk suppliers (by number of applicable suppliers).



REVIEW MECHANISMS

To ensure compliance with this policy, Hazel 4D will implement the following measures:

- **Due diligence:** We will conduct regular due diligence on our suppliers to ensure that they are in compliance with our anti-slavery policy and applicable UK laws. This is comprised of onsite visits, virtual assessments and monitoring of supplier policies and processes. We will utilise our membership of Sedex and risk matrix to support our efforts in this area.
- **Training:** We will provide training to our suppliers and employees on anti-slavery laws and regulations, including those in the UK, and best practices for preventing slavery in the supply chain
- **Quantitative targets:** We will monitor our performance against the quantitative targets highlighted above.
- **Stakeholder engagement:** We will engage with stakeholders, such as employees, customers, suppliers, and local communities, to gather feedback and input on our performance and to identify areas for improvement.
- **Continuous improvement:** We will adopt a continuous improvement mindset, seeking out opportunities to optimise operations and activities such as the adoption of new technologies or processes, or the implementation of best practices, to ensure compliance and promote our company values in relation to the prevention of slavery.

Signed

Neil Christie
Managing Director