MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Introduction

The Modern Slavery Act 2015 (the 'Act') mandates that Hotchkiss prepares a slavery and human trafficking statement each financial year. Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world and a violation of fundamental human rights.

Hotchkiss have a zero-tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

Please also refer to our Data Protection Policy (GDPR).

Our Business

The economic, social and environmental footprint of our business activity is a fundamental consideration in Hotchkiss' commitment to responsible and sustainable business growth. Hotchkiss, manufacturer and installer of heating and ventilation ductwork, are an equal opportunity employer and are committed to a policy of treating all our employees and job applicants equally.

Responsibility

The Directors and senior management team of Hotchkiss have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf in any capacity comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our employees, suppliers, workers, directors, agents, distributors and all third party business partners).

Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Whistleblowing Policy
- Supplier / Procurement Procedure
- Recruitment Policy
- Corporate Social Responsibility Policy
- Anti-corruption & Bribery Policy
- Dignity at Work Policy

Due diligence

Hotchkiss Ltd undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Hotchkiss Ltd.'s due diligence and reviews include:

- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- creating an annual risk profile for each supplier;

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 practises have been identified.

Training

Training on this policy and the risk our business faces from Modern Slavery and Human Trafficking forms part of the induction process at commencement of employment. Training will be delivered to existing personnel as appropriate. Regular refresher training will be provided as required.

Awareness-raising programme

We take the following steps:

- Communicating with staff and carrying out relevant talks and training;
- Enabling access to the policy for all staff;

Actions to Take

- Anyone undertaking work on behalf of, or as part of, the Group of companies must notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future; and

- Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

Breaches of Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We reserve the right to terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Review

Hotchkiss will review both its supply chains and external operations and its internal operations on an ongoing basis to check compliance with the above policy, and to verify that our policy is being implemented effectively.

Grob Groups' Modern Slavery and Human Trafficking Policy has been developed in accordance with The Modern Slavery Act 2015.
The following resources have been utilised in the development of this Policy:
- Gov.uk overview of the Modern Slavery Act and supporting documents https://www.gov.uk/government/collections/modern-slavery-bill
- Parliament copy of the Act and its explanatory notes http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted

Authorised for Issue:





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**All policies are reviewed periodically.*