

## **ANNUAL STATEMENT FOR THE FINANCIAL YEAR ENDING 31<sup>ST</sup> DECEMBER 2023: SLAVERY AND HUMAN TRAFFICKING**

This statement is made on behalf of Harworth Group plc and its subsidiaries in accordance with section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes our Modern Slavery statement for the financial year ending 31<sup>st</sup> December 2023.

### **Our Pledge**

Modern slavery concerns the exploitation of individuals by another person for personal or commercial gain. It can take various forms and includes servitude, slavery and forced labour but will include the deprivation of an individual’s liberty (“**Modern Slavery**”). Modern Slavery is a crime and a violation of fundamental human rights.

We have a zero-tolerance approach to Modern Slavery and are committed to the prevention, deterrence, and detection of it both within our business and our supply chain. It is our policy to conduct all business activities with honesty, integrity and at the highest possible ethical standards. We expect our supply chain partners to aim for the same high standards.

### **Our business and organisational structure**

As a regenerator and master developer, Harworth is committed to transforming land and property into sustainable places where people want to live and work. We aim to have a positive environmental and social impact by supporting new homes, jobs and communities. The Harworth Way is our framework for ensuring that our communities, our people and our planet are at the heart of everything we do.

Harworth Group plc is the ultimate parent company with 38 wholly or majority owned subsidiaries, together with investments in 4 joint venture limited liability partnerships (the “**Group**”). The activities of the Group and its joint ventures are undertaken solely in the United Kingdom and all the Group’s companies and joint ventures have their registered office in England.

Harworth owns and manages a property portfolio which comprises approximately 14,000 acres of land across around 100 sites located throughout the North of England and Midlands, which was valued at £768,000,000 as at 31 December 2023. Our business is organised into two segments: Capital Growth and Income Generation, which operate across three regional divisions: Yorkshire and Central, North West and Midlands.

At the end of the 2023 financial year, the Group employed 118 people across four principal offices. The majority are based at our head office in Rotherham with approximately 30 based at our regional offices in Manchester, Birmingham and Leeds, albeit many of our employees spend a significant amount of their time visiting our sites and meeting with external stakeholders. We operate a flexible working environment with some employees working from home for up to two days per week.

Our business model appears below:

Value creation

### Acquisition & land assembly

Our acquisition teams work across our regions to identify new sites to add to our portfolio, through freehold purchases, options or Planning Promotion Agreements ('PPAs'). Often larger sites are assembled over a number of years through the acquisition of smaller land parcels.

### Masterplanning

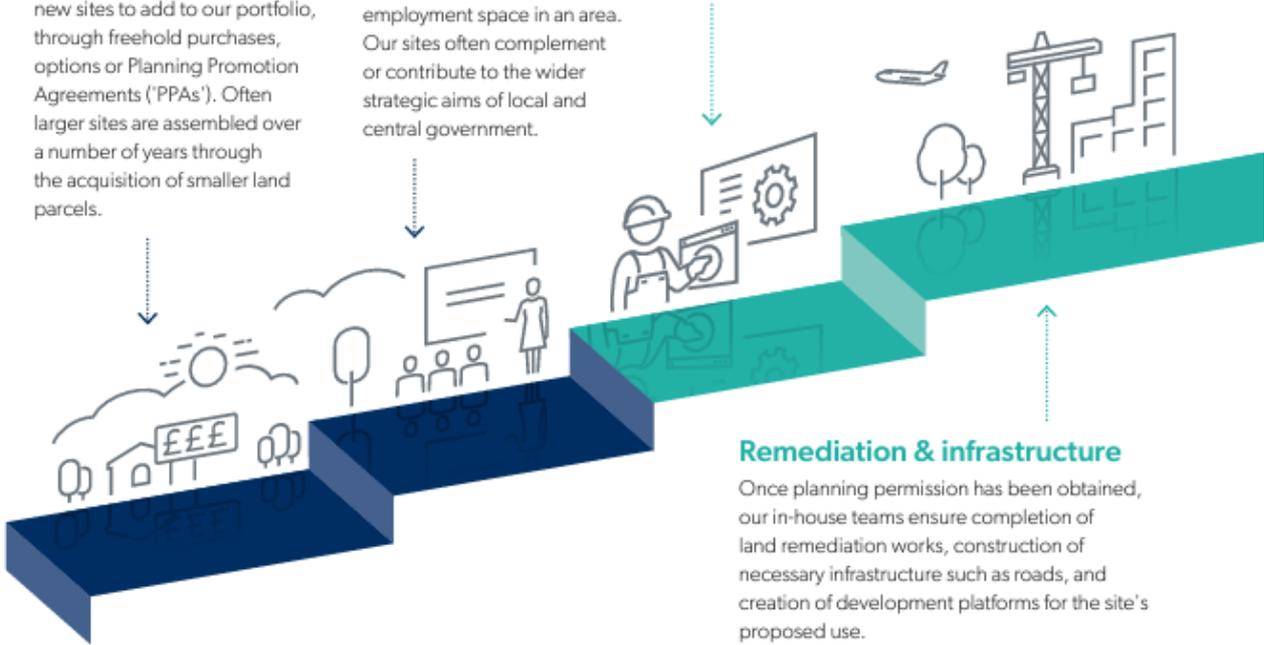
Working with local authorities and other stakeholders, we create a strategic vision for a site that addresses local needs for housing or employment space in an area. Our sites often complement or contribute to the wider strategic aims of local and central government.

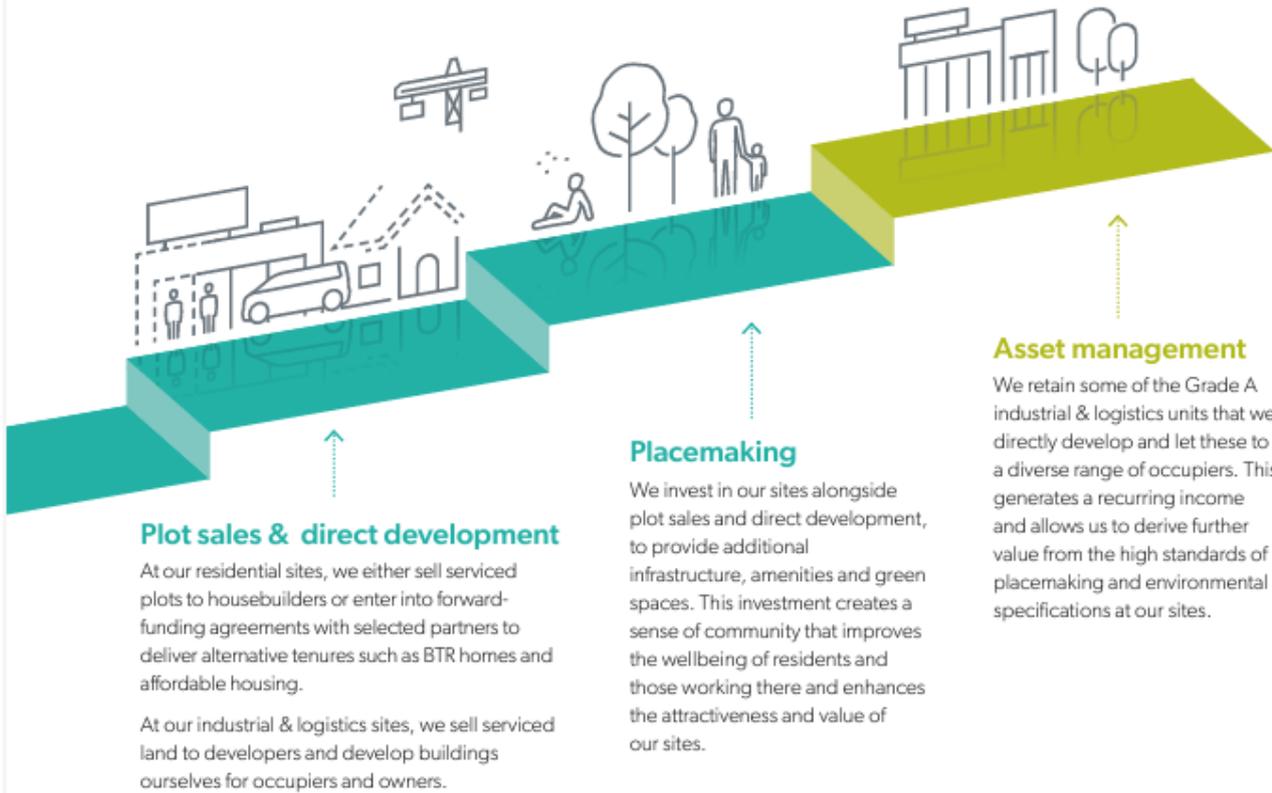
### Planning approval

Once a strategic vision for a site has been determined, our planners work with local authorities to progress this through the planning system. We have a very high success rate of securing planning permissions, while working collaboratively with local stakeholders.

### Remediation & infrastructure

Once planning permission has been obtained, our in-house teams ensure completion of land remediation works, construction of necessary infrastructure such as roads, and creation of development platforms for the site's proposed use.





**Our internal governance structure**

Our internal governance structure appears below:

### Audit Committee

- Reviews the integrity of the Group's Financial Statements and formal announcements on its financial performance, including reviewing financial reporting judgements contained within them.
- Advises the Board on whether the Group's Annual Report is fair, balanced and understandable, and provides the information necessary for shareholders to assess the Group's position and performance, business model and strategy.
- Reviews the Group's operational risks, the effectiveness of the risk management system and of our internal controls and processes, and the internal audit function and programme.
- Reviews the independence and effectiveness of the external auditor and the internal audit function and reviews the terms of appointment and remuneration of the external auditors and leads any tender process for their appointment.
- Oversight of cyber and information security.
- Oversight of the annual renewal of the insurance programme.

See pages 107 to 113 for the full report

### Remuneration Committee

- Determines and proposes to the Board the Company's Remuneration Policy, ensuring alignment with purpose and strategy.
- Determines the salaries, bonuses, long-term incentive arrangements, pension arrangements, other benefits and contract terms of the Executive Directors and other members of the Executive team.
- Monitors performance against bonus targets and long-term incentive underpins.
- Reviews workforce remuneration and related policies, and the alignment of Executive incentives and rewards with that of the wider workforce.

### The Board

Examples of matters reserved for the Board:

- Setting strategy and approval of annual budget and strategic plan.
- Oversight of the financial and operational performance and resilience of the business.
- Oversight of performance and reporting against our Sustainability Framework and NZC Pathway.
- Identification of, determination of risk appetite for, and review of measures to mitigate and manage, the Group's principal risks.
- Oversight of the appropriate regard by the Company for the interests of its stakeholders.
- Approval of accounts and dividends.
- Approval of underwriting proposals for all new sites, direct developments and development management engagements.
- Approval of Board appointments; external appointments of Directors and the Executive team.
- New or material changes to senior debt facilities.
- Oversight of the people strategy.
- Oversight of health and safety for all sites and projects.

### Nomination Committee

- Reviews the size and composition of the Board to ensure a balance of skills, experience and knowledge on the Board and its Committees.
- Oversight of succession planning for the Board and Executive team.
- Leads the process for Board appointments.
- Oversight of progress in improving diversity across the business.

See pages 98 to 106 for the full report

### ESG Committee

- Oversees the Group's Sustainability Framework, including targets and KPIs.
- Oversees the development of the NZC Pathway, including targets and KPIs.
- Reviews sustainability policies, processes and initiatives, and the measurement of progress towards sustainability targets.
- Oversees the processes for gathering data for ESG measures.
- Oversees how all elements of the Sustainability Framework are reported in the Annual Report and other public reporting, and recommends any ESG disclosures to the Audit Committee.

See pages 114 and 115 for the full report.

### Disclosure Committee

- Ensures compliance with disclosure obligations under the UK Market Abuse Regulation and the FCA's Listing Rules and Disclosure Guidance and Transparency Rules.

#### Executive

- Supports the Chief Executive in the day to day running of the business and the formulation and implementation of the strategy.
- Consulted on strategic and operational matters that have been delegated to the Chief Executive pursuant to the Board Reserved Matters Policy.
- Reviews the performance of the business against agreed operational and financial KPIs.

#### Investment Committee

- Delegated authority for material development and investment activities.
- Reviews all material projects and material departures from project plans including matters reserved for the Board before they are presented, where appropriate, for approval.
- Consulted on strategy, budgeting, people matters, transformation projects and sustainability initiatives.

#### Group Leadership Committee

- Ensures effective communication and collaboration between all operating divisions and functions sharing knowledge and experience, including site and project information, market intelligence, innovation opportunities and contacts.
- Monitors the risk profile of the business.

#### Corporate Governance Committee

- Responsible for certain decisions of a material nature relating predominantly to resourcing and transformation, including reward, recruitment, organisation design and transformation projects.
- Monitors certain matters relating to resourcing and transformation, including the learning and development programme and succession plans.

#### Environment, Health, and Safety (EHS) Committee

- Senior leaders from across the business meet quarterly, and at short notice if required, with a strategic focus on EHS data (trends and areas of concern); significant incidents; internal EHS projects/initiatives, and external EHS matters (legislative horizon scanning, industry trends and/or intelligence).

### Our suppliers and other stakeholders

Our supply chains include: demolition, remediation, infrastructure and construction contractors, sub-contractors and consultants; asset managers; and professional services advisors. We also work closely with a wide range of other stakeholders including: landowners, housebuilders, commercial occupiers, funders, local and planning authorities, Combined Authorities, regulatory bodies, Central government and associated arms-length bodies, schools, universities, utilities providers, and joint venture partners.

### Our policy

We are committed to ensuring that there is no Modern Slavery or human trafficking in our supply chains or in any part of our business. In May 2017, the Board of Directors approved the implementation of an Anti-Slavery and Human Trafficking policy (our “**Policy**”), which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our business or supply chains. The Policy appears on the Investors section of our website ([www.harworthgroup.com/investors/governance/](http://www.harworthgroup.com/investors/governance/)) and in **Appendix 1** to this statement. The Executive team, comprising the Chief Executive, Chief Financial Officer, Chief Operating Officer, Chief Investment Officer, and General Counsel, has overall responsibility for ensuring compliance with the Policy and is committed to making available sufficient resources for its implementation.

### Implementation of our policies

#### *Our business and employees*

All our employees are aware that Harworth operates a zero-tolerance approach to Modern Slavery in our business and supply chains. All our previous modern slavery statements, including this current statement, are available on the Responsibility section of our website (<https://harworthgroup.com/responsibility/>).

All employees have been made aware of the Act and given a copy of our Policy. An email reminder of the Policy, with a copy attached, is sent to employees annually. During the period under review this was sent in June 2023. A further reminder has been sent ahead of publication of this statement. Our Policy remains available throughout the year on our intranet, alongside our other policies.

All new starters are made aware of our policies, including the Policy, as part of their induction process. In the first half of 2018, training on Modern Slavery and human trafficking was delivered to all employees in the form of an online webinar, which also covered topics such as anti-bribery and corruption and whistleblowing. That training was compulsory and undertaken by all employees. Since then, completion of the training has formed a compulsory part of the induction process for all new employees.

As part of our commitment to continuous improvement in the management of risk and compliance and the professional development of our employees, we have undertaken to build a training and education programme which will include providing all employees with annual training for key compliance topics including Modern Slavery. We previously communicated our intention to implement a Learning Management System (LMS) to facilitate a training and education programme, which has been deferred as part our wider change management programme. Pending implementation of that system, the target date for which is not yet known, we are planning to deliver refresher training to all employees on modern slavery and human trafficking via a recorded webinar, which will be compulsory.

*Our Supply Chain*

Given the size of our property portfolio, we recognise the importance of monitoring “on-site” activity by our employees and our suppliers, to mitigate against the risk of slavery or trafficking taking place on our sites, particularly those which are more remote from our head office and regional offices.

We achieve this in a number of ways, primarily through site visits. Our Estates Management team, supported by appointed agents, carry out periodic planned inspections of our sites. All sites are inspected at least once annually. Sites considered to be higher risk, such as those on which development and construction work is being undertaken, are inspected far more frequently. When undertaking these visits, the teams complete a site risk inspection report. Colleagues within the business also carry out ad hoc inspections throughout the year and we encourage them to complete a site visit report on each occasion. Our Environmental, Health and Safety team undertake site inspection audits of certain sites to provide assurance on the effectiveness of our site inspection regime.

Both template reports used for site visits include sections covering working conditions for contractors on site. Below is an extract:

<b>HEALTH AND WELLBEING</b>	
<i>Welfare facilities available, if applicable</i>	
<i>Evidence of unsuitable working practices or contractors mistreating, or imposing unreasonable working conditions on, its employees</i>	

We operate a Safety Health and Environmental Management system (SHEMs) via an online cloud platform. This platform supports reporting of site incidents and risk assessments, including real time reporting via a mobile application. Since the updated SHEMs was introduced during last year, we have continued to see increased reporting. Upgrades continue to be made to the platform to improve its functionality and thereby facilitate and encourage reporting.

### *New suppliers*

In conjunction with our Policy, we also operate a Supplier Code of Conduct on Anti-Slavery and Human Trafficking (our “Code”). This also appears on the Investors section of our website ([www.harworthgroup.com/investors/governance/](http://www.harworthgroup.com/investors/governance/)) and in **Appendix 2** to this statement.

As part of our supplier “take-on” procedure, all prospective suppliers must complete a due diligence questionnaire. In completing this questionnaire, each prospective supplier must: (i) state whether it is required by the Act to make a modern slavery statement and, if so, provide a copy of it; (ii) tell us what steps it takes to ensure that there is no slavery or trafficking in its own business or supply chains; and (iii) confirm that it will comply with our Code. An extract from our supplier “take-on” questionnaire appears below. All responses to these questionnaires are reviewed by our Risk and Compliance team before suppliers are approved and appointed, with escalation to our General Counsel and Company Secretary if appropriate.

All the suppliers whom we have engaged for the first time since June 2017 (when we published our first modern slavery statement) have followed the above “take-on” procedure and confirmed that they will comply with our Code.

### **Section 11 – Anti-Slavery and Human Trafficking**

*Harworth is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or that of any of our suppliers. Please respond to the following questions, which are designed to ensure that you are also committed to ensuring modern slavery is not taking place within your business.*

<p><i>Is your business required to produce a statement under Section 54 of the Modern Slavery Act 2015?</i></p> <p><i>If yes, please attach the latest statement or provide a web link</i></p>	
<p><i>Please indicate if your business has any of the following:</i></p> <ul style="list-style-type: none"><li><i>• A written anti-slavery policy?</i></li><li><i>• A written whistleblowing policy (or equivalent)?</i></li><li><i>• A code of conduct which includes modern slavery and trafficking content?</i></li><li><i>• Training for staff on stopping modern slavery and trafficking?</i></li><li><i>• A risk assessment to understand the risks of slavery and trafficking in your business and supply chains?</i></li></ul>	
<p><i>Does your business take steps to ensure that the third parties with which you contract, and their suppliers (i.e your suppliers’ suppliers), ensure that slavery and trafficking are not taking place in their operations and supply chains? Please describe any steps taken.</i></p>	
<p><i>Please describe any other steps your business has taken to ensure slavery and trafficking are not taking place in your business or supply chain.</i></p>	
<p><i>We operate a Supplier Code of Conduct in respect of Anti-Slavery and Human Trafficking, which appears on our website (in the “Corporate Social Responsibility” section). A copy is also available on request. Please confirm that you will comply with that Code of Conduct.</i></p>	

### *Existing suppliers*

When we first published our modern slavery statement on 30 June 2017 we communicated with the majority of suppliers who already formed a part of our supplier base with our expectation that they comply with our Code and asked them to: (i) confirm that they have a zero-tolerance approach to slavery and trafficking; and (ii) explain their policy and procedures in relation to anti-slavery and trafficking.

During financial year ending 31<sup>st</sup> December 2022, an internal working group was formed to (i) evaluate the onboarding practices for new suppliers, (ii) obtain a detailed understanding of the composition of our existing supplier base and (iii) identify priorities for improvements in our procurement and supplier management practices. This work was supported by a specialist, external consultancy firm.

In 2023, the findings from this first stage review exercise have informed the formulation of a procurement transformation exercise, led by an internal secondee and will support the transition to a new target operating model for all forms of procurement across the business. Work on this project remains ongoing, with completion due in 2024.

We anticipate that, once complete, this project will lead to the implementation of further assurance measures which will cover, amongst other things, compliance with our Code by both existing and new suppliers.

### *Our precedents*

In 2019 we updated our suite of precedent development contracts and consultancy appointments, in conjunction with one of the firms on our legal panel, and these precedents are reviewed regularly. All our precedents impose obligations on our contractors and consultants in relation to anti-slavery and human trafficking.

As trailed in our 2022 statement, a full review of all precedent legal documents was undertaken during 2023. Existing and required precedents across all departments of the business were identified together with an exercise to determine key provisions and clauses to be included within the same. An internal secondee has been appointed to manage and develop this project through to completion during 2024, which will result in a comprehensive suite of updated and new precedents. We do not expect substantial amendments to be made to our development supply chain agreements because these are already in a mature state. We do expect precedents for use with our wider supply chain to be updated and/or established incorporating provisions to mitigate against modern slavery and human trafficking, notwithstanding the lower risk in those segments of the supply chain.

### *Reporting*

Employees are encouraged to report to the General Counsel and Company Secretary any concerns about the existence of Modern Slavery in our business or supply chains. We operate a robust Speak Up policy and process, which protects employees in that regard. The effectiveness of that policy and process is reviewed annually by the Audit Committee.

Both the policy and process were reviewed in March 2022, pursuant to which we launched a Harworth dedicated "Speak Up" Hotline, which is available to all employees, suppliers, contractors, and stakeholders, to report knowledge or suspicions of un-ethical or unlawful behaviour. This ensures that anyone who has concerns, including about Modern Slavery in our business or supply chains, has the means of raising these concerns confidentially.

The extension of this facility to suppliers, contractors and external stakeholders has been supported by an awareness campaign, including posters signposting the facility placed at sites which have welfare facilities and updates to our website making the contact details available to all.

We continue to profile our Speak Up Policy internally within the business. There is ongoing communication across the business to raise awareness of the Speak Up Hotline and usage is monitored and compared to industry statistics to gauge awareness. The facility is explicitly referenced in the induction program delivered to all new starters and now has a dedicated section on our intranet.

### Measuring effectiveness

Below are the key performance indicators (“KPIs”) we have identified to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in our business or supply chains, together with our progress against those KPIs since the last statement.

KPI	Progress during reporting period (Financial Year 1 <sup>st</sup> January 2023 to 31 <sup>st</sup> December 2023)
<ul style="list-style-type: none"> <li>➤ <b>Suppliers:</b> we aim to notify all new suppliers that we expect them to comply with our Code and ask them to: (i) confirm that they have a zero-tolerance approach to slavery and trafficking; and (ii) explain their policy and procedures in relation to anti-slavery and trafficking.</li> </ul>	<ul style="list-style-type: none"> <li>➤ All new suppliers continued to complete our supplier “take-on” questionnaire and confirmed that they will comply with our Code.</li> </ul>
<ul style="list-style-type: none"> <li>➤ <b>Awareness and training:</b> Training on the risks and warning signs of, and measures to prevent, modern slavery should be delivered to all employees.</li> </ul>	<ul style="list-style-type: none"> <li>➤ All new employees completed the online training as part of their induction.</li> <li>➤ Reminders about our Policy were sent to all employees in June 2023.</li> <li>➤ The Speak Up facility continues to be included within the induction program for all new starters within the business.</li> <li>➤ The first “Discovery” phase of a wholesale digital transformation project has been completed, which will now support the formulation and implementation of a digital transformation strategy. This will include implementation of an LMS.</li> </ul>
<ul style="list-style-type: none"> <li>➤ <b>Launch and profile of “Speak Up” Hotline:</b> offering a dedicated Harworth resource to report knowledge or suspicion of unethical or unlawful behaviour, including Modern Slavery within our business or supply chain.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Awareness campaign continues to be promoted internally and externally to ensure all parties are aware of the facility and understand its purpose.</li> <li>➤ Ongoing communication and awareness program to ensure internal colleagues and external stakeholders are aware of the facility.</li> </ul>

	<ul style="list-style-type: none"> <li>➤ There is now a section on our intranet dedicated to the Speak Up platform.</li> </ul>
<ul style="list-style-type: none"> <li>➤ <b>Comprehensive review of procurement practices:</b> to identify a target operating model for all forms of procurement across the business, the benefits of which will include improved assurance of supply compliance with the Code.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Commencement of procurement transformation exercise, led by an internal secondee.</li> </ul>
<ul style="list-style-type: none"> <li>➤ <b>Development of precedent documents:</b> to ensure consistency of terms across our supplier base.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Identification of a full list of existing and required precedents, together with key clauses and provisions to be included within the same.</li> </ul>

New KPIs identified
<ul style="list-style-type: none"> <li>➤ Pending establishment of a new LMS platform as part of the rollout of the digital transformation strategy, compulsory refresher training will be delivered via a recorded webinar. .</li> </ul>
<ul style="list-style-type: none"> <li>➤ We will transition to a new target operating model for procurement which will enhance how we monitor, engage with and manage our suppliers including their commitment to the Code.</li> </ul>
<ul style="list-style-type: none"> <li>➤ All new commercial precedent documents, will incorporate consistent compliance provisions, including in relation to Modern Slavery and human trafficking.</li> </ul> <p><i>* Where precedents are not available, we will continue to include consistent compliance clauses within commercial contracts that are reviewed and negotiated by our in-house legal, team.</i></p>
<ul style="list-style-type: none"> <li>➤ Upgrades will be made to the SHEMS platform to improve its functionality and facilitate/encourage reporting.</li> </ul>

### Ongoing review

The Policy and Code (and their effectiveness) remain subject to annual monitoring and review by our General Counsel and Company Secretary.

**Lynda Shillaw**  
**Chief Executive**  
**Harworth Group plc**  
**12 June 2024**

## Appendix 1: Anti-Slavery and Human Trafficking Policy

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### 1. Introduction

- 1.1 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.
- 1.2 Forms of modern slavery may include, but are not limited to, withholding of passports, being forced to work against a person's will, depending on the employer for housing, food, and other necessities, being recruited through some form of debt arrangement, such as an advance or loan, and limitations on movement of workers.
- 1.3 Harworth strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold themselves and their own suppliers to the same high standards.

### 2. Policy Statement

- 2.1 We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:
- We have a zero-tolerance approach to modern slavery in our organisation or our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain are the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
  - We are committed to engaging with our stakeholders and direct suppliers to address the risk of modern slavery in our operations and supply chain.
  - As part of our contracting processes, we include a specific prohibition against the use of modern slavery and trafficked labour and a requirement to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
  - Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with our Code of Conduct. Suppliers engaging workers through a third party are also required, via the Code, to obtain third parties' agreement to adhere to the Code of Conduct.

### 3. Policy Application

- 3.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers and interns.

3.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3.3 Workers must ensure that they read, understand and comply with this policy.

#### 4. **Responsibility for the policy**

4.1 The Senior Executive team is committed to making available sufficient resources for the implementation of this policy and has overall responsibility for ensuring compliance.

4.2 The Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

4.3 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.

4.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Company Secretary.

#### 5. **Reporting Modern Slavery**

5.1 Employees must notify their manager or the Company Secretary as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain or may occur in the future or have any concerns or suspicions relating to compliance with this policy. In the event that employees do not feel comfortable raising their concerns internally, they are also able to use our Harworth dedicated Speak Up Line, which is operated by an independent third party, NAVEX Global. Full details of this facility are available within our Speak Up Policy.

5.2 If a person, other than an employee, has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify as soon as possible the Company Secretary. Similarly, if the third party would feel more comfortable, they can also use our Speak Up Line. This facility has been extended to all Harworth suppliers, contractors, stakeholders and third parties.

5.3 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. 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.

#### 6. **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

**1. INTRODUCTION**

Harworth is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers, contractors and business partners to adhere to the principles in this Code, in accordance with our contractual terms of engagement. We expect you to require the same standards of your own sub-contractors, suppliers and business partners.

**2. CODE OF CONDUCT: PRINCIPLES**

- 2.1 Workers shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime. All work must be carried out voluntarily.
- 2.2 Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice in accordance with applicable laws and collective agreements, and without the imposition of any improper penalties.
- 2.3 Workers shall not be mentally or physically coerced to provide their labour.
- 2.4 Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment and the withholding of property shall not be used directly or indirectly to restrict workers' freedoms or to create workplace slavery.
- 2.5 Fees or costs associated with the recruitment of workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to workers whether directly or indirectly. Similarly, workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.
- 2.6 Workers shall have their terms of employment or engagement set out in a written document that is easily understandable to them and which clearly sets out their rights and obligations. This written document shall include, but not be limited to, transparent terms with respect to wages, overtime pay, payment periods, working hours and rights in respect of rest breaks and holiday. Such written terms shall be provided to the worker in advance of them starting work, shall be honoured by the employer and shall meet industry standards and the minimum requirements of applicable laws and collective agreements where the work is carried out.
- 2.7 There shall be no use of child labour. Nobody shall be employed under the minimum age. Subject to the overriding prohibition on the use of child labour, if workers under the age of 18 are employed then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.
- 2.8 Workers, their families and those closely associated with them shall not be subject to harsh or inhumane treatment including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation. Migrant workers, their

families and those closely associated with them should not be subject to discrimination due to their nationality.

- 2.9 Workers shall be free to file grievances with their employers about the employer's treatment of them and workers shall not suffer detriment, retaliation, or victimisation for having raised a grievance.
- 2.10 Workers shall be free to move without unreasonable restrictions and shall not be physically confined to the place of work or other employer-controlled locations (for example accommodation blocks) nor shall they be confined by more indirect means. There shall be no requirement placed on workers that they take accommodation in employer-controlled premises except where this is necessary due to the location or nature of the work being performed.
- 2.12 Where it is necessary to recruit workers who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged. Where workers are sourced to be employed directly, only reputable recruitment agencies shall be engaged. All such agencies must have the necessary licences and registrations under local laws; agree to adhere to this Code of Conduct; and agree to be audited to ensure their compliance with this Code of Conduct.

### 3. REPORTING OF BREACHES OF THIS CODE OF CONDUCT

- 3.1 Any person concerned about a breach of this Code of Conduct or our Anti-Slavery and Human Trafficking Policy may report their concerns on a confidential basis to our Company Secretary, whose contact details appear below. Individuals with concerns are encouraged to provide their name and contact details so that the issues that they raise can be investigated thoroughly. However, we recognise that in some circumstances an individual will only be prepared to raise their concerns on an anonymous basis and we commit to investigate anonymous allegations as thoroughly as possible and to take the necessary remedial action.
- 3.2 In the event that any person does not feel comfortable raising their concerns with the Company Secretary, they are also able to use our Harworth dedicated Speak Up Line, which is operated by an independent third party, NAVEX Global.
- 3.3 Contractors and their subcontractors are to ensure that our Company Secretary's contact details and the details for our Speak Up Line are made available to all workers.

#### Company Secretary contact details

**Chris Birch**  
**Group General Counsel and Company Secretary**  
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