

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

For the purpose of this document the following companies, which are all associated with each other, will be referred to as “The Halliwell Jones Group”.

Halliwell Jones Ltd, Halliwell Jones (Chester) Ltd, Halliwell Jones (Warrington) Ltd, Halliwell Jones (North Wales) Ltd, Halliwell Jones (Wilmslow) Ltd, Halliwell Jones (Wilmslow) Bodyshop Ltd, Freedom Rental Ltd and Halliwell Jones Deva Ltd.

The Halliwell Jones Group is committed to understanding the risks of modern slavery and to put in place safeguards to ensure modern slavery does not occur in our company or supply chains.

The Halliwell Jones Group maintains relationships with many different organisations in our supply chains. With centres in Warrington, Chester, Southport, North Wales and Wilmslow, the Halliwell Jones Group employs approximately 600 staff. In light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, the policy below underpins the Halliwell Jones Group’s approach and will be used as a basis for its Statement on Slavery and Human Trafficking.

1. POLICY STATEMENT

- 1.1 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. We have a zero-tolerance approach to modern slavery and 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 business or in any of our supply chains.
- 1.2 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 contractors, suppliers and other business partners, and as part of our contracting processes, we 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 will hold their own suppliers to the same high standards.
- 1.3 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, interns, agents, contractors, external consultants, third-party representatives and business partners.

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

2. RESPONSIBILITY FOR THE POLICY

- 2.1 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.
- 2.2 The Finance Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 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.
- 2.4 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 Finance Director.

3. COMPLIANCE WITH THE POLICY

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your manager or the Finance Director as soon as possible if you believe or suspect that a breach with this policy or a conflict with this policy has occurred, or may occur in the future.
- 3.4 You are encouraged to 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.
- 3.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Finance Director.
- 3.6 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 Finance Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Halliwell Jones Group intranet.

- 3.7 In the event the Halliwell Jones Group become aware of any instances of non-compliance, each instance will be investigated and assessed by the Halliwell Jones Group on a case by case basis. Remedial action will be taken appropriate to the circumstances of each case. In the cases of non-compliance with our suppliers, the Halliwell Jones Group will temporarily suspend business (to the extent permitted under contract or by law) with any supplier who it suspects of non-compliance. If a supplier continually fails to comply, then the ultimate sanction will be for the Halliwell Jones Group to cease to trade with that supplier (to the extent as permitted under contract or by law).

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 We undertake a risk based approach to Modern Slavery in our Business and communicate with all suppliers, contractors and business partners who are identified at the outset of our business relationship as higher risk relationships.

5. BREACHES OF THIS POLICY

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