



## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT**

### **1. INTRODUCTION**

Modern slavery is a despicable form of organised crime in which people are exploited for criminal gain. It is inhumane, unethical and damaging to society, yet it remains an issue in corporate supply chains around the world. Hargreaves Services plc and all of its subsidiary undertakings (**Hargreaves**) is committed to the eradication of slavery and human trafficking and this statement is made in compliance with section 54(1) of the Modern Slavery Act 2015.

Hargreaves will not knowingly use forced labour, slavery or unlawful child labour in providing any of its services or products, nor will it knowingly accept services or products from suppliers that employ or utilise forced or unlawful child labour or any form of slavery.

This statement reflects Hargreaves' commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains. It sets out Hargreaves' policy and the steps that Hargreaves is taking to prohibit any form of forced labour or slavery throughout its supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Hargreaves' slavery and human trafficking statement for the financial year ending 31 May 2024. It was approved by the board on 26 September 2024. This statement applies to Hargreaves Services plc and the UK subsidiaries listed in Appendix 1.

### **2. STRUCTURE, BUSINESS AND SUPPLY CHAINS**

Hargreaves is a diversified group delivering services to the industrial and property sectors, supporting key industries within the UK and South East Asia. It has operations in the UK, Asia and South Africa and has approximately 1,457 employees worldwide. A full list of UK subsidiaries is included at Appendix 1.

Hargreaves provides critical support to many core industries including Energy, Environmental, UK Infrastructure and certain manufacturing industries through the provision of materials handling, mechanical and electrical contracting services, logistics and major earthworks. Hargreaves Land is focused on the sustainable development of brownfield sites for both residential and commercial purposes.

Hargreaves' supply chain includes material and equipment suppliers, subcontractors and employment/labour agencies. Due to the geographies in which Hargreaves operates and the nature of activities being undertaken, the risk of employing forced labour or those who may be subject to human trafficking is generally low. However, the Group has identified areas of the business that has an increased risk of exposure to modern slavery and has introduced



systems and processes (supported by periodic internal checks and review) to reduce such risk, as further detailed below.

### **3. POLICIES**

Hargreaves has implemented a comprehensive suite of policies, policy statements and procedures, which are reviewed and approved by the Board annually. These policies and procedures include: a Code of Ethics statement; an Anti-Corruption and Bribery Policy; a Whistleblowing Policy; a Group Health and Safety Policy Statement; a Group Competition Law Statement; an Environmental Policy; a Sustainable Supply Chain Policy. Copies of these policies and policy statement can be found on our website at <https://www.hsgplc.co.uk/>.

During the financial year ended 31 May 2024, Hargreaves rolled out a Group Anti-slavery and Human Trafficking policy, which outlines the principles and standards adopted across the Group to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chain. This policy also outlines how employees can raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains. Hargreaves Whistleblowing Policy also encourages staff to raise concerns in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

### **4. DUE DILIGENCE PROCESSES**

Business Units have implemented systems and processes which ensure that an employee's identity is confirmed and they have a legitimate right to work in the UK to reduce the risk of employing forced labour or those who may be subject to human trafficking.

New suppliers in the UK are required to complete the Group supplier onboarding process, which include due diligence in respect of compliance with the Modern Slavery Act 2015.

### **5. RISK ASSESSMENT AND MANAGEMENT**

The risk of employing forced labour or individuals subject to human trafficking is increased in respect of labour deployed on sites and contracts. Furthermore, the use of subcontractors and employment agencies increase the risk of modern slavery taking place on Hargreaves sites and within our supply chain.

The above risk is managed by the due diligence processes described above. Furthermore, where an increased risk in respect of modern slavery has been highlighted, the relevant Business Unit has introduced additional internal review checks. For example, during the financial year ended 31 May 2024, the business has introduced random checks for employment agencies requiring them to produce HMRC eligibility to work documents and copy payslips.

## **6. KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN**

As described above, where an increased risk of employing forced labour or individuals subject to human trafficking has been identified, the applicable Business Unit has implemented systems and processes to reduce the risk supported by periodic internal checks.

We have identified the following key performance indicators to be measured during the next financial year ending 31 May 2025:

1. Track the percentage of staff that have received anti-slavery and human trafficking training to be rolled out for the year ending 31 May 2025 – see paragraph 7 for details of the training.
2. Track how many incidents of modern slavery have been identified in business or supply.

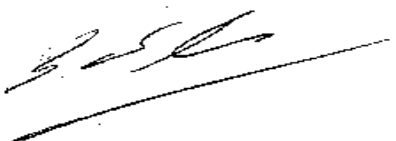
## **7. COMMUNICATION AND TRAINING**

During the next financial year ending 31 May 2025, the Group will roll out online anti-slavery and human trafficking training to employees. The purpose of the training is to raise awareness of modern slavery and explain how employees can raise concerns about any issue or suspicion of modern slavery in any parts of our business or its supply chains.

## **8. OUR OBJECTIVES DURING THE FINANCIAL YEAR ENDING 31 MAY 2025**

- Roll out anti-slavery and human trafficking training to employees.
- Continue to assess and identify modern slavery risk across the Group.
- Review the findings from internal audits/checks in respect of the systems and processes that have been implemented to reduce the risk of employing forced labour or those who may be subject to human trafficking.
- Measure the key performance indicators that have been implemented.

Signed:



Date: September 2024

**Gordon Banham, CEO**  
Hargreaves Services plc



## APPENDIX 1 – LIST OF SUBSIDIARIES

### List of Registered Offices:

- 14.1 West Terrace, Esh Winning, Durham, DH7 9PT
- 14.4 Van Heetveldelei 178, 2100 Deurne, Antwerp, Belgium
- 14.5 Suite 2, Park House Earls Colne Business Park, Earls Colne, Colchester, Essex, England, CO6 2NS
- 14.8 3 Nobel Boulavard, Cape Gate NE3, Vanderbijlpark, Gauteng, 1900
- 14.9 Lot 6.05, Level 6, 8 First Avenue, Bandar Utama, 47800 Petaling Jaya, Selangor Darul Ehsan, Malaysia
- 14.10 Room 1117-8, 11th Floor, Tuen Mun Central Square, N0.22 Hoi Wing Road, Tuen Mun, New Territories, HK

### UK SUBSIDIARIES

	Address of registered office
Hargreaves (UK) Services Limited	14.1
The Monckton Coke & Chemical Company Limited	14.1
Maltby Colliery Limited	14.1
HE Contracts Limited	14.1
Maxibrite Limited	14.1
RocPower Limited	14.1
OCCW (St Ninians) Limited	14.1
OCCW (Duncanziemere) Limited	14.1
OCCW (Chalmerston) Limited	14.1
OCCW (Netherton) Limited	14.1
OCCW (Damside) Limited	14.1
OCCW (Broken Cross) Limited	14.1
OCCW (House of Water) Limited	14.1
C. A. Blackwell (Contracts) Limited	14.1
Geofirma Soils Engineering Limited	14.1
Renaissance Land Regeneration Limited	14.1
Hargreaves Land (North) Limited	14.1
Hargreaves Land (South) Limited	14.1
SBU Limited	14.1
S&B Utilities Limited	14.1
Dalquhandy Windfarm SPV Limited	14.1
Broken Cross Energy SPV Limited	14.1
North Kyle Windfarm SPV Limited	14.1
Kennoxhead SPV Limited	14.1
Broken Cross Windfarm SPV Limited	14.1
Westfield EFW SPV Limited	14.1
Poniel Energy SPV Limited	14.1
Killoch Energy SPV Limited	14.1
Westfield Windfarm SPV Limited	14.1
Westfield Solar SPV Limited	14.1
Hargreaves Land Group Limited	14.1
Mcleod Construction Materials Ltd	14.1
Hargreaves LD Limited	14.1
Hargreaves Environmental Services Limited	14.1



	Address of registered office
Hargreaves (UK) Limited	14.1
Hargreaves Industrial Services Limited	14.1
Forward Sound Limited	14.1
Hargreaves Land Limited	14.1
H Technical Resources Limited	14.1
Hargreaves Maltby Limited	14.1
Hargreaves Property Ventures Limited	14.1
Hargreaves Services (Westfield) Limited	14.1
Hargreaves Services (Castlebridge) Limited	14.1
Hargreaves Services (Blindwells) Limited	14.1
Hargreaves Services Forestry Limited	14.1
C.A. Blackwell Group Limited	14.1
Hargreaves Pension Company Limited	14.1
Hargreaves Land Holdings Limited	14.1
Blackwell Earthmoving Limited	14.5

### NON-UK SUBSIDIARIES

	Address of registered office
Hargreaves Carbon Products NV	14.4
Hargreaves Industrial Services (HK) Limited	14.10
Access Services (HK) Limited	14.10
Hargreaves Power Services (HK) Limited	14.10
Hargreaves Services (HK) Limited	14.10
Hargreaves Services South Africa (Pty) Ltd	14.8
Hargreaves Industrial Services Sdn Bhd	14.9