



# Anti-Slavery Policy

**Applicable to:**

All persons within the HBC

**Effective from:**

January 2026

**Policy/Guidance Number:**

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**To be reviewed by:**

February 2027

**Staff responsible for revision:**

Board of Directors

**Linked documents:**

Ethics policy

**Versions:**

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## **1. Policy statement**

- 1.1. Modern slavery is a crime and a gross 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 that 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 (the 'Act'). 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. The aim of the Act is in line with our own purpose and values.
- 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 Board of Directors have 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 Board of Directors. We will aim to update and build on this policy in the coming years to ensure that our response is as robust as possible to the potential of trafficking or slavery in our supply chains.

### **3. Compliance with this 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. If you:
  - Believe or suspect that a breach of this policy has occurred or that it may occur, and/or
  - Wish to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier you must raise it with your line manager or Board of Directors or report it in accordance with our whistleblowing policy as soon as possible. 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, please raise it in any event.
- 3.4. We 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 your line manager or the Board of Directors immediately or report it in accordance with our whistleblowing policy. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure.

### **4. Policy measures**

- 4.1. This policy is intended to be specifically tailored to take into account the risks associated with the sector in which we operate, the complexity of our supply chains, and the countries where those in its supply chains are based. For example:
  - HBC are UK-based, therefore mitigating (although not removing) the risks of trafficking and slavery occurring in countries with poorer records of trafficking and slavery than the UK.
  - We are required to comply with high labour standards in relation to our employees, through the presence of a number of human resources and other related policies.
  - Therefore, the greater risk of trafficking or slavery relating to our businesses would be unlikely to occur within the company itself but be further down the supply chain we use.
- 4.2. Our supply chains include:
  - Consultants and advisers
  - Contractors and sub-contractors

- Suppliers of goods, supplies and materials for all stages of the construction cycle, and
- Suppliers of plant and machinery.

4.3. We have identified the following areas of the supply chain as comprising the highest risk of slavery and trafficking activities:

- Human trafficking: In circumstances when using sub-contracted labour forces, where coerced/trafficked gangs may be present.
- Slavery and human trafficking: In circumstances when using materials such as “conflict minerals” (tantalum, tin, gold or tungsten), steel, or other raw materials being predominantly sourced from countries with poor records on slavery and human trafficking.

4.4. To combat the risk from these areas and in any other potential areas where trafficking or slavery may enter our supply chains, we have put in place measures comprising:

- Contacting existing sub-contractors, and certain categories of land development consultants and professional legal advisers to ask them to confirm their adherence to this policy.
- Ensuring that new core suppliers, sub-contractors, professional consultants and advisers undertake to comply with our anti-slavery policy through use of due diligence questionnaires and relevant contractual provisions, with appropriate termination provisions for failure to comply.
- Ensuring that the high-risk areas as identified under paragraph 4.3 are kept under regular review to determine whether additional and/or targeted measures are required within our supply chain to combat the risk of slavery and trafficking.
- Ensuring that our whistleblowing procedure is drafted sufficiently widely to encourage whistleblowing in relation to any identified breaches of our anti-slavery policy.
- Inclusion of anti-slavery requirements within our sustainable procurement charter.
- Inclusion of modern slavery and human trafficking risk on all our risk registers for monitoring going forwards, to be reviewed every six months.
- Production of a supplier briefing pack and site information pack with posters to publicise the issue of modern slavery and how to report it.
- Production of a pocket guide, “toolbox talk” and posters which provide short-form information on identifying and reporting modern slavery, for distribution throughout the business.
- Contacting any other categories of existing suppliers, consultants and professional advisers as appropriate to ask them to confirm their adherence to our anti-slavery policy.
- Ensuring that supplier audits are capable of being carried out in the event of the report of a potential issue relating to human trafficking or slavery.
- Introduction of mandatory e-learning on the topic of modern slavery.
- Active subscription to the Gangmasters & Labour Abuse Authority’s (GLAA) Construction protocol ensuring that we work collaboratively with the GLAA to share information that will help stop or prevent the exploitation or abuse of workers.

- Participation in the Construction Works and Associated Services Modern Slavery assessment, implementing any areas for improvement.
- 4.5. Suppliers and sub-contractors will be required, through their compliance with our policy, to:
  - Have in place their own due diligence practices and contractual obligations within their ongoing supply chain, with the aim of eliminating from their supply chain any suppliers or sub-sub-contractors who have trafficking or slavery practices within their supply chains.
  - Give additional assurances in the event that a sub-contract or supply contract relates to the high-risk areas identified in paragraph 4.3.
  - Have in place their own whistleblowing procedure for identifying breaches of this policy or the supplier or sub-contractor's own policies.
  - Have in place appropriate training on the requirements of the Act and relevant policies.

## **5. Communication and awareness of this policy**

- 5.1. 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 people who work for us, and regular training will be provided as necessary. In 2021 we introduced mandatory e-learning to all employees on the topic of identifying and reporting modern slavery and trafficking in our supply chains.
- 5.2. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **6. Disciplinary processes and supplier adherence**

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

## **7. Ongoing review**

- 7.1. This anti-slavery policy will be subject to regular and ongoing reviews to ensure its effectiveness, and to update the requirements where further measures are identified.