

# POLO9 MODERN SLAVERY & HUMAN TRAFFICKING POLICY

# Competence – Reliability – Openness - Humility

## **Modern Slavery and Human Trafficking Statement 2024**

Hardtech HV Ltd is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities' employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

### **Our supply chain**

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited, and we procure goods and services from a restricted range of UK and overseas suppliers, mainly through contracts of limited supply.

We adopted the following mechanisms for guarding against modern slavery in its clients' supply chains.

### **Our policies in relation to the Modern Slavery Act 2015**

The following policies are available to all staff through the Hardtech HV Ltd SharePoint site:

- Code of conduct
- Ethics policy
- Whistle blowing policy.
- Bullying and harassment policy
- Diversity and inclusion policy
- Recruitment and selection policy

### **Embedding the principles**

We will continue to embed the principles through:

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- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- ensuring staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK.
- ensuring that consideration of the modern slavery risks and prevention are added to Hardtech HV Ltd.'s policy review process as an employer and procurer of goods and services.
- making sure Hardtech HV Ltd procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- continuing to take action to embed a zero-tolerance policy towards modern slavery.
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

This statement has been approved by any Director, for the financial year ending 31<sup>st</sup> January 2024.

This statement will be reviewed and updated every year.

Signed on behalf of Hardtech H.V. Limited



Phil McClennon  
Director  
Hardtech H.V. Limited

27/2/24