

## 23.1 Introduction

- 23.1.2 Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms such as, slavery, servitude, human trafficking and forced labour, 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. . HOP has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings.
- 23.1.3 HOP is also committed to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business. We expect the same high standards from those that we have a business relationship with.
- 23.1.4 This policy applies to all persons working for us or on behalf, in any capacity, including employees at all levels.
- 23.1.5 This policy does not form part of an employee’s contract of employment and HOP may amend this at any time.

## 23.2 Responsibility of this policy

- 23.2.1 The board of Directors have overall responsibility for ensuring this policy complies with HOP’s legal and ethical obligations, and that all those under HOP’s control comply with it.
- 23.2.2 All employees are invited to comment on this policy and suggest ways in which it may be improved. All comments are encouraged and should be addressed to a member of HR.

## 23.3 Policy Compliance

- 23.3.1 All employees must ensure that they have read, understood and comply with this policy.
- 23.3.2 The prevention, detection and reporting of modern slavery is the responsibility of all those working for HOP or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 23.3.3 All HOP staff must notify a member of senior leadership if they believe or suspect that a conflict of this policy has occurred, or may occur in the future.
- 23.3.4 All staff are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage.
- 23.3.5 HOP aims to encourage openness and all staff members that raise a genuine concern in good faith, under this policy, will be supported, even if they turn out to be mistaken. HOP are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith, their suspicion that modern slavery of any form is, or may be taking place in any part of the business or that of someone we work with.
- 23.3.6 Detrimental treatment includes; dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they are encouraged to inform a member of HR immediately. If the matter is not remedied, as an employee, they should raise this concern formally using the Grievance procedure.

	Authorised:	John Spearman	Page	1 of 2
	Author:	Ria French	Version	1.4

# Modern Slavery Policy



### 23.4 Communication & Awareness

- 23.4.1 Awareness of this policy, will form part of the induction process for all appointed employees. Training refreshers will be provided as necessary.
- 23.4.2 HOP's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and clients at the outset of the business relationship, and reinforced as appropriate.

### 23.5 Breach of the policy

- 23.5.1 Any HOP employee who breached this policy will face disciplinary action. This could result in dismissal for misconduct or gross misconduct.
- 23.5.2 HOP may terminate the relationship with individuals and organisations working on our behalf, should they come in breach of this policy.

Signed:   
Managing Director

Date January 2021

	Authorised:	John Spearman	Page	2 of 2
	Author:	Ria French	Version	1.4