

# Modern Slavery Policy

February 2023



## Modern slavery Policy

### Introduction

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 to exploit them for personal or commercial gain.

John F Hunt Regeneration Ltd has a zero-tolerance approach to modern slavery and we are committed 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.

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, Agents, Contractors, Suppliers or any other people or bodies associated with the business.

### Responsibility for the Policy

The Board of Directors have overall responsibility for ensuring this policy complies with our legal obligations, and that all those under our control comply with its contents.

The 'Compliance Team' which includes the Group Compliance Director, Associate Director of HSEQ and the Integrated Management Systems Manager work together to ensure that this policy is maintained across all operational areas of the Group in accordance with evolving regulatory requirements and to ensure that any breaches or concerns are addressed.

The CEO and Directors have primary and day-to-day responsibility in relation to our supply chain for implementing this policy. This includes; monitoring its use and effectiveness, dealing with any queries regarding this policy and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

The Integrated Management Systems Manager has primary and day-to-day responsibility in relation to those directly employed by us for implementing this policy, including, 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.

All persons working for the Company must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern-day slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All persons working for the Company are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All persons working for the Company 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 at the earliest possible stage.

### Communication and Awareness of this Policy

This policy will be communicated to all Company Employees at induction and reinforced regularly.

Company Employees are required to communicate our zero-tolerance approach to modern slavery to all Suppliers, Contractors and business partners at the outset of our business relationship with them and reinforce our approach as appropriate thereafter.

## Indicators of Forced Labour

The International Labour Organisation (ILO) has identified the following 11 indicators that highlight the circumstances where forced labour may be found<sup>1</sup>:

- Abuse of vulnerability;
- Deception;
- Restriction of movement;
- Isolation;
- Physical and sexual violence;
- Intimidation and threats;
- Retention of identity documents;
- Withholding of wages;
- Debt bondage;
- Abusive working and living conditions;
- Excessive overtime.

The signs of modern slavery may appear ordinary at first but on closer examination more worrying traits may be apparent.

Someone in slavery might<sup>2</sup>:

- Appear to be under the control of someone else and reluctant to interact with others;
- Not have personal identification on them;
- Have few personal belongings, wear the same clothes every day, or wear unsuitable clothes for work;
- Not be able to move around freely;
- Be reluctant to talk to strangers or the authorities;
- Appear frightened, withdrawn, or show signs of physical or psychological abuse;
- Dropped off and collected for work always in the same way, especially at unusual times, i.e. very early or late at night.

If you suspect that modern slavery is, or may, be taking place DO NOT confront them as this may lead to increased harm. Inform the relevant authorities, there are the following helplines and websites:

- Police – 999 if a crime is taking place, 101 non-emergencies
- [Modern Slavery Helpline](#) 08000 121700
- [Gangmasters & Labour Abuse Authority](#) (GLAA) 0800 4320804
- Crimestoppers 0800 555111
- [Anti-slavery website](#)

## Due Diligence

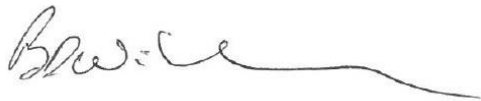
In order to give effect to our zero-tolerance approach, we have systems in place to ensure that all Employees and those in our supply chain implement our policy. This Policy will as a minimum be reviewed once per annum.

## Breaches of this policy

Any breach of this policy will generally be treated as gross misconduct and may result in instant dismissal without notice.

We may terminate our relationship with individuals and/or organisations working on our behalf, if they do not comply with this policy.

The Company Employees are encouraged to raise concerns about any issue or suspicion of modern-day slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.



**Ben Williams**  
**CEO**  
February 2023

<sup>1</sup>International Organisation of Labour.

<sup>2</sup>Anti Slavery Organisation