

## Modern Slavery and Human Trafficking Statement 1

### 1.0 Anti-slavery policy

Hutchison Technologies has a zero-tolerance approach to modern slavery and human trafficking and is committed to upholding and respecting human rights. We recognise that the practice of modern slavery takes varying forms including servitude, forced labour, child labour, human trafficking, and any and all forms of the deprivation of one's liberty by another for personal or commercial gain.

We pledge to act ethically and with integrity in all our business dealings and supply chain relationships, and never to knowingly use products or services derived in any part from the practice of modern slavery in any of its forms. The following statement outlines the steps we have taken to ensure that slavery and human trafficking are not operating directly within our businesses or indirectly within our global supply chain.

### 1.2 Our supply chain

Our supply chains consist of the sourcing of materials, components and labour associated with the manufacture of electrical products and the provision of electrical services.

### 1.3 Our key risk areas

The risk of modern slavery is considered to be greater relative to geographical region. In our assessment, Hutchison Technologies operates primarily in the UK and Western Europe, and is staffed by directly employed or regularly contracted staff of Hutchison Technologies therefore the company is at a lower risk of modern slavery issues.

In our assessment, the risk of modern slavery in our global operations is greater due to geographical factors and the inherent difficulties associated with vetting people and processes across expansive international supply chains.

### 1.4 Frameworks we follow

Despite the low risk associated with our main UK and European operations, in comparison to our international operations, we recognise that human trafficking can take various, often unrecognisable forms. For this reason, the following policies are applicable across all of our operations:

- 1.4.1 Our **Recruitment Policy** complies with EU and UK employment law, including strict eligibility for work checks designed to confirm the ages of our employees in order to prevent child labour; to prevent agencies from collecting fees or retaining workers' passports or ID documents; and to prevent unfair employment terms by providing employees with detailed employment contracts
- 1.4.2 Our **Business Code of Conduct** refers to equal opportunities, labour practices, Living Wage compliancy, DDA compliancy, and statements of adherence to UK, European, and international occupational, health & safety standards
- 1.4.3 We follow a confidential **Whistleblowing Policy** that safeguards staff from reprisal in the event that they report concerns about our operations
- 1.4.4 We operate a **Preferred Supplier** list and maintain this regularly. Before entering into business relationships with new suppliers and vendors, we conduct a thorough online

search to establish whether the organisation in question has ever been convicted of offences relating to modern day slavery. This policy has also been enacted retroactively to assess our pre-existing suppliers. Additionally, all suppliers must conform to our Business Code of Conduct

Following due consideration and the enactment of our existing policies, we have not identified any instances of modern slavery or human trafficking in any branch of our business, though we continue to be alert to the possibility and to mitigating future risk.

### **1.5 Plans for continuous improvement**

We are committed to ever greater understanding of our workforce and supply chains, and to working towards ever greater transparency and responsibility within them. To this end, we are currently pursuing the following enhancements to our policies:

- 1.5.1 The development and circulation of a supplier self-assessment questionnaire to ensure suppliers comply with our core Business Code of Conduct and Modern Slavery policies. Once suppliers have responded we will be able to assess their compliance with our company values and make an informed decision on continuing our business relationship
- 1.5.2 The development of standard clauses on anti-slavery and human trafficking to be incorporated into contracts with suppliers, requiring confirmation that no part of their business operations contradicts our policies. These clauses would allow us the right to terminate contracts at any time should instances of modern slavery come to light
- 1.5.3 The development of more detailed ongoing training for new and existing staff to ensure a high level of understanding of the risks of modern slavery in our businesses and supply chains
- 1.5.4 The appointment of a dedicated compliance officer for the ongoing establishment and implementation of policies and procedures to allow us to continue to assess and monitor the risk of modern slavery

### **1.6 Concluding remarks**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement for Hutchison Technologies Ltd in the current financial year.

This statement has been approved by Hutchison Technologies Directors, Bruce Hutchison and Mark Hutchison.

May 2019