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Modern Slavery and Human Trafficking Statement

July 2017

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2017	31/07/2017	Clarifications to comply with the Modern Slavery Act 2015	Paul Roche

No	Referenced Documents	Intranet link
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1.0 Document Scope

This statement sets out:

- ◆ Hurley Palmer Flatt's policy on Modern Slavery and Human Trafficking.
- ◆ Hurley Palmer Flatt's responsibilities, and of those working for us, in observing and upholding our policy.
- ◆ The procedures implemented to ensure the policy is enforced.
- ◆ Guidance to those working for us on how to recognise and deal with Modern Slavery and Human Trafficking.
- ◆ Policies and procedures in this document apply to the business activities of Hurley Palmer Flatt and its subsidiaries globally.
- ◆ The policy applies to all individuals working at all levels and grades, including Senior Managers, Officers, Directors, Employees (whether permanent, fixed-term or temporary), Consultants, Contractors, Trainees, Seconded Staff and Agency Staff, Volunteers, Interns, Agents and Sponsors.
- ◆ This statement relates to actions and activities during the financial year(s) commencing 1st April 2017 and will be reviewed as necessary.

2.0 Policy Statement

This statement is made with the commitment to prevent Modern Slavery and Human Trafficking in our business activities with the aim of ensuring that there is no slavery or human trafficking in our business and supply chains.

It is the policy of the Hurley Palmer Flatt Board:

To be conscious of and take a robust approach to avoiding Modern Slavery and Human Trafficking.

To recognise that as an international consultant in the construction sector we face risks associated with Modern Slavery and Human Trafficking.

To ensure that Hurley Palmer Flatt, its subsidiaries and its supply chain are free from Slavery and Human trafficking.



Signed

Paul Roche - Group Director

Date: July 2017

3.0 Procedure

3.1. Organisational Structure and Supply Chains

Hurley Palmer Flatt is a Global Multi- Disciplinary Engineering Consultancy Service operating in the United Kingdom, Singapore, Middle East and Australia.

All of Hurley Palmer Flatt's work is delivered by staff (permanent, temporary, agency, consultants, contractors, sub-contractors) and suppliers. Hurley Palmer Flatt is committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all of those who work for us. We are also committed to monitoring social standards in our supply chain, and encourage our suppliers to operate in the same ethical standards we employ ourselves.

3.2. Policies and Contractual Controls

HPF's internal policies include our Human Rights policy and our Code of Ethics, in which we confirm that we will not tolerate or condone abuse of Human Rights within any parts of our business or supply chains and will take seriously any allegations that human rights are not properly respected.

Whistleblowing policy- this is aimed at our staff and others working in our supply chain which encourages staff to report any wrong-doings which extends to Human Rights violations such as Modern Slavery. All reports will be fully investigated and appropriate remedial actions taken.

3.3. Responsibilities

3.3.1 Human Resources Director shall

- ◆ chair a committee meeting to undertaking a group level risk assessment of Modern Slavery and Human Trafficking, relevant to the Company's activities
- ◆ produce a draft procedure for approval by the Executive Board.
- ◆ ensure that a yearly risk assessment and associated risk changes are mitigated by if necessary make changes to the policy.
- ◆ ensure actual or suspected cases of Modern Slavery or Human Trafficking are investigated and reported to the Board.
- ◆ ensure that staff are made aware of and if necessary provided with adequate training in the scenarios that may give rise to Modern Slavery or Human Trafficking.

3.3.2 Project Directors

Project Directors are responsible for risk assessments in relation to specific project-related activities.

3.3.3 Chief Finance Officer

Hurley Palmer Flatt's Group CFO is responsible for risk assessments in relation to supply chain activities.

3.4. Risk Assessments

In general Hurley Palmer Flatt's consultancy activities produce a low risk in relation to Modern Slavery or Human Trafficking. However, Hurley Palmer Flatt recognises that some activities do contain higher risk and thus form part of the standing assessment process. For example, in Design and Build contracts, where Hurley Palmer Flatt are working for a construction contractor, particularly in territories where Modern Slavery and Human Trafficking are known to be an endemic problem.

3.4.1 The Company shall regularly assess the nature and extent of the risks relating to Modern Slavery and Human Trafficking to which it is exposed, being aware that risks are potentially present internally and externally within the supply chain.

3.4.2 The risk assessment exercises shall include consideration of:

- ◆ the Company's business activities across all of its operations nationally and internationally and any actual or proposed changes to those activities;
- ◆ the Company's staff, their knowledge and understanding of the Company's business profile and associated Modern Slavery and Human Trafficking risks;

3.4.3 The extent of due diligence into business relationships will vary according to the risk. Where appropriate, before entering into any business relationship, the actions the Company may take include, but are not limited to:

- ◆ making enquiries about the risk of Modern Slavery and Human Trafficking in a particular country or location in which the Company is seeking a business relationship;
- ◆ the types of activity most commonly encountered and any information about the preventive actions which are most effective.

3.5. Investigation and Incident Response

3.5.1 Where instances of Slavery and/or Human Trafficking are known or suspected, the Management Board shall be made aware at the earliest opportunity.

3.5.2 The management Board will select a Board Director to carry out an initial investigation in conjunction with the Human Resources Director.

3.5.3 Investigations into suspected activities shall include all of the following:

- ◆ Interviews with clients or supply chain members.
- ◆ Interviews with staff members involved.
- ◆ A review of relevant documentation.

3.6. Training and Communication

3.6.1 Training on this policy forms part of the induction process for all new staff.

3.6.2 All existing staff will receive training on how to adhere to this policy.

3.6.3 All subsequent changes to this policy will be communicated to all staff.

3.6.4 Modern Slavery and Human Trafficking training shall include-

- ◆ Standard purchasing practices, which are designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- ◆ Advice on how to identify the signs of Modern Slavery and Human Trafficking;
- ◆ Advice on what initial steps should be taken if Slavery or Human Trafficking is suspected;
- ◆ Advice on how to escalate potential Slavery or Human trafficking issues to the relevant parties within the organisation;
- ◆ Information on external help available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and the "Stronger Together" initiative;
- ◆ Advice on what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- ◆ Advice on steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Hurley Palmer Flatt supply chain.

3.6.5 As well as formal training, awareness is raised and information can be requested through the company's information portal. This includes:

- ◆ The basic principles of the **Modern Slavery Act 2015**;
- ◆ Advice on how employers can identify and prevent Modern Slavery and Human Trafficking;
- ◆ Advice on what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- ◆ Information on available external help, for example through the Modern Slavery Helpline

3.7 Monitoring and Review

3.7.1 The Compliance Manager will monitor the effectiveness of our Modern Slavery and Human Trafficking Policy and review the implementation of this policy, regularly [and at least annually] considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering Modern Slavery and Human Trafficking.

3.7.2 Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries shall be reviewed by the Compliance Manager.

3.7.3 This policy does not form part of any employee's contract of employment and it may be amended at any time.

END

Board Approval

NAME	Paul Flatt
POSITION	Group Chairman
SIGNATURE	
DATE	31 July 2017