

MODERN SLAVERY ACT 2015 STATEMENT

Introduction

This statement is made for and on behalf of HTS Group Limited (“HTS”) and its subsidiaries (HTS (Property & Environment) Limited, HTS (Housing & Regeneration) Limited and HTS P&E Services Limited). HTS Group Ltd is a private company incorporated in England and Wales with registered number 09929960.

As a responsible employer and business, we are committed to preventing modern slavery and human trafficking and ensuring that it does not take place in any part of our business, including our supply chain. HTS’s aspiration is to have a positive impact on the fair and safe working conditions of those working directly or indirectly for us and we expect our suppliers/contractors/partners to share our vision.

HTS also recognises that it has a responsibility to take a robust approach to slavery and human trafficking and acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking in accordance with s.52 MSA and the Modern Slavery Act 2015 (Duty to Notify) Regulations 2015.

This statement sets out how we deliver this commitment, understanding and mitigating the risks of slavery or human trafficking taking place within our business or supply chain, ensuring ethical practices and demonstrating compliance with the Modern Slavery Act 2015 (“the Act”).

HTS understands that within the industry we operate we are not immune from the risks of modern slavery. We have implemented strategies, policies, and procedures aimed at detecting and preventing slavery and human trafficking. Furthermore, we undertake various measures to ensure compliance with the Act and to protect our staff, agency workers, and supply chains.

Relevant Policies

HTS operates the following policies that support our commitment to addressing modern slavery risks and steps to be taken to prevent slavery and human trafficking in their operations.

- Whistleblowing policy – We operate a whistleblowing policy which is designed to empower all employees to raise their concerns and make disclosures, without fear of retaliation. It provides a mechanism for both our employees and others working within our supply chain. HTS have a dedicated email address for whistleblowing and are also members of an independent, confidential, whistleblowing service which all employees have access to.
- Employee code of conduct - The code makes clear to employees the actions and behaviour expected of them when representing HTS. We strive to maintain the highest standards of employee conduct. We are committed to acting ethically and with integrity in our business dealings and relationships and have the same expectations from our supply chain.
- Grievance policy - This policy allows workers to bring concerns or work-related issues to the attention of management and has been vetted by the trade union.

- Anti-Fraud, Bribery and Corruption Policy – This stipulates responsibilities for acting honestly and with integrity, whilst ensuring activities, interests and behaviours do not conflict with these obligations, regardless of seniority. Reporting of all suspicions is included within.
- Equality, Diversity & Inclusion Policy – The purpose of this policy is to provide equality, fairness and respect for all, and to not unlawfully discriminate because of the Equality Act 2010 protected characteristics, and to oppose and avoid all forms of unlawful discrimination.
- Dignity at Work Policy – we are committed to creating a working environment that encourages respectful, dignified, harmonious working relations and equality of opportunity for all employees. This is fundamental to our corporate objectives.

Application

The following measures in are in place to ensure that HTS fully complies with the Act to protect staff, agency workers and supply chains from human trafficking and slavery.

Supply chain:

- All tender documents include a statement that our minimum expectations of our contractors/suppliers/partners that there is 'no use' either directly or by any sub-contractors or within the supply chain of: a. Child labour b. Slavery, Forced, Bonded or Involuntary Labour c. Human Trafficking or Exploitation.
- All tenders will continue to require contractors to provide confirmation that they are compliant with the Act, including a declaration stating, "they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offences involving slavery and human trafficking".
- Goods and services are purchased from UK or EU based companies who are required to comply with the Act and/or similar legislation in the EU states.
- All Purchase Orders and new contracts include specific contract terms requiring all suppliers to comply with the Act.
- Where possible, we will seek to build long term professional relationships with suppliers and their supply chains.
- We will not knowingly support and approve any business involved with slavery and/or human trafficking and any such occurrence will result in the removal of such an organisation from our supply chain. Our aim is to only trade with those who comply with the Act.

Recruitment:

- Well-established safer recruitment processes in place, including conducting pre-employment screenings for all directly employed personnel to ensure they are eligible to work in the UK.
- We commit to only using specified, reputable employment agencies to source labour for agency workers.

Employees:

- HTS is an accredited Living Wage Employer, certified by the Living Wage Foundation to demonstrate our commitment to paying a real living way and play our part in tackling in-work poverty.
- DBS Checks (where applicable).
- Fair access to training and development for all employees.

- All of our workers are free to join or form a Trade Union and participate in collective bargaining
- A programme of Equality, Diversity & Inclusion training, and Mental Health Awareness training, for supervisory and management employees to provide a better understanding of cultural awareness.
- Staff awareness of their responsibilities to report concerns in their professional and personal life regarding human trafficking and modern slavery will take place via targeted training through e-learning and training material.

Progress and Future Plans

We are proud of the steps that HTS Group Limited and subsidiaries has taken so far to combat slavery and human trafficking, however, recognise that this is an area which requires continual monitoring and improvement, and we will continue to focus on improvements.

To date we have not identified any suspected incidences of Modern Slavery in our supply chains. 2023 reporting: zero incidents of noncompliance to Human Slavery policy.

Set out below are the actions and actives which HTS Group Limited and subsidiaries will undertake during the financial year 2024 to 2025 to continue to meet the requirements of the Modern Slavery Act:

1. We intend to continue to raise awareness with staff and our suppliers.
2. Continue to gain a greater understanding of HTS' supply chain practices and procedures of our key suppliers to understand how they address the Modern Slavery Act.
3. Undertake due diligence checks for new suppliers
4. Schedule audits of our suppliers who are identified as the highest risk of modern slavery, and compliance with social, economic and environmental legislation.

Organisational Declaration

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") and constitutes our organisations slavery and human trafficking statement for the financial year ending March 2024.

This statement is approved by the HTS Group Limited Board and will be subject to review on an annual basis.



David Morrissey
Managing Director
May 2024