



MODERN SLAVERY & HUMAN TRAFFICKING

Introduction The Modern Slavery Act 2015 (the 'Act') mandates that Hotchkiss Ltd prepares a slavery and human trafficking statement each financial year. Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world and a violation of fundamental human rights.

Hotchkiss Ltd. have a zero-tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

Our Business The economic, social and environmental footprint of our business activity is a fundamental consideration in Hotchkiss Ltd's commitment to responsible and sustainable business growth. Hotchkiss Ltd, manufacturer and installer of heating and ventilation ductwork are an equal opportunity employer and are committed to a policy of treating all our employees and job applicants equally.

Responsibility The Directors and senior management team of Hotchkiss have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf in any capacity comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our employees, suppliers, workers, directors, agents, distributors and all third party business partners) .

At Hotchkiss we endeavour to ensure transparency in our supply chain with a zero tolerance approach to modern slavery. We work with our supply chain to ensure that:

- Modern slavery is not present in their company
- Suppliers evaluate risk within their own supply chain
- Safe and fair working conditions are provided
- Compliance is reflected in their policies, procedures and practices

Commitment Hotchkiss are implementing and enforcing a number of measures, policies and controls both internally and externally to ensure compliance with the requirements of the Modern Slavery Act 2015.

Training on this policy and the risk our business faces from Modern Slavery and Human Trafficking forms part of the induction process at commencement of employment. Training will be delivered to existing personnel as appropriate. Regular refresher training will be provided as required.

Compliance All persons working for us or on our behalf in any capacity must:

- Read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy;
- Notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future; and
- Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

Breaches of Policy Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Review Hotchkiss Ltd will review both its supply chains and external operations and its internal operations on an ongoing basis to check compliance with the above policy, and to verify that our policy is being implemented effectively.

Hotchkiss Ltd will review this policy annually in line with each financial year end.

A handwritten signature in black ink, appearing to read 'David Baldock', written over a horizontal line.

David Baldock
Managing Director
January 2018

Hotchkiss' Modern Slavery and Human Trafficking Policy has been developed in accordance with The Modern Slavery Act 2015.

The following resources have been utilised in the development of this Policy:

- Gov.uk overview of the Modern Slavery Act and supporting documents. <https://www.gov.uk/government/collections/modern-slavery-bill>
- Parliament copy of Act and its explanatory notes <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>