

## Human Slavery and Human Trafficking Policy Statement

### Our Policy on Slavery and Human Trafficking:

This Slavery and Human Trafficking Policy Statement reflects Holden Building Solutions Ltd commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls.

We are committed to ensuring that there is no Slavery or Human Trafficking in our Supply Chain, Sub-Contractors or in any part of our business.

### Due Diligence processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, i.e.:

- Where possible, we will build long standing relationships with local Suppliers and Sub-Contractors
- We will make clear our expectations of business behaviour
- We expect our Supply Chain and Sub-Contractors to have suitable Slavery and Human Trafficking policies and processes in place as part of our vetting procedures
- We also have in place systems to encourage the reporting of concerns and the protection of whistle blowers

### Supplier Adherence to our Values

- We have zero tolerance to Slavery and Human Trafficking
- We expect all those in our Supply Chain and any Sub-Contractors to comply with our values
- The Company Director is responsible for compliance in their Duty of Care and for the Company's Supplier and Sub-Contractor relationships

### Information and Communication

To ensure a high level of understanding of the risks of modern Slavery and Human Trafficking in our Supply Chain and our business, we communicate relevant information to relevant members of staff and operatives.

### Our effectiveness in combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that Slavery and Human Trafficking is not taking place in any part of our Business or Supply Chain, i.e.:

- Completion of Audits and Inspections by Company Managers and representatives including input from our external Health and Safety Consultant
- Use of labour monitoring and payroll systems to check eligibility of employees in the UK. This Policy Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's Slavery and Human Trafficking Policy Statement.

We also take lead and guidance from the UK Government's Human Trafficking Strategy which aims to tackle trafficking from end to end: from recruitment to exploitation, ensuring we have the right tools and intelligence to reduce the threat, and maintaining effective victim support.

This policy applies to all activities undertaken by (or on behalf of) Holden Building Solutions Ltd including its staff, sub-contractors, supply chain partners and clients.



Carl Holden  
Managing Director  
11<sup>th</sup> January 2023