

Anti-Slavery and Human Trafficking Policy

Purpose

This policy outlines our commitment to preventing slavery, forced labour, and human trafficking within our organization and supply chains. We recognize our responsibility to be vigilant in identifying, mitigating, and addressing risks of modern slavery and to conduct business ethically and transparently.

Scope

This policy applies to all employees, directors, contractors, suppliers, and any other parties working on behalf of Hartgraph Ltd. It is applicable across all regions and sectors in which we operate.

Policy Statement

Our organization has a zero-tolerance approach to slavery, forced labour, and human trafficking. We are committed to acting ethically, with integrity, and in compliance with applicable laws, including the Modern Slavery Act 2015. We seek to work only with suppliers and partners who share our values and uphold similar standards.

Our Commitments

- **Risk Assessment and Due Diligence:** We will conduct regular risk assessments to identify areas of potential risk in our operations and supply chains and implement effective due diligence procedures to mitigate those risks.
- **Supplier Vetting and Relationships:** We will engage with suppliers who uphold our commitment to combat modern slavery. Our supplier contracts and relationships will include clauses that outline our expectations and rights to audit suppliers for compliance.
- **Training and Awareness:** We will provide training to employees and relevant third parties to raise awareness of modern slavery risks and to help them identify and report any concerns related to slavery and human trafficking.
- **Grievance and Reporting Mechanisms:** We encourage employees, suppliers, and other stakeholders to report any concerns regarding modern slavery. Reports can be made anonymously, and we ensure that there will be no retaliation against individuals who report in good faith.
- **Investigation and Remediation:** We will thoroughly investigate reports of modern slavery or human trafficking within our operations or supply chains. Appropriate corrective action will be taken for verified concerns, which may include ending relationships with non-compliant suppliers.

Roles and Responsibilities

- **Senior Management:** Responsible for policy approval, oversight of anti-slavery measures, and ensuring adequate resources are allocated for implementation.
- **Employees:** Required to report any concerns they may have regarding modern slavery and to adhere to our policies and procedures.

Reporting Mechanism

Any employee or third party who suspects an instance of modern slavery or human trafficking within our organization or supply chain is encouraged to report it. Reports can be made via:

- Letter or email to a director of the company

Reports will be taken seriously, investigated promptly, and treated confidentially. We are committed to ensuring that there is no retaliation against individuals who report in good faith.

Monitoring and Auditing

- We will regularly monitor our operations and supply chains to identify and mitigate any risks of modern slavery.

Review and Continuous Improvement

This policy will be reviewed annually to ensure its effectiveness and to incorporate improvements as necessary. Updates will reflect changes in legislation, industry practices, and organizational standards.

Consequences of Policy Breach

Any employee or supplier found to be engaging in, supporting, or failing to report instances of modern slavery may face disciplinary action, including dismissal or termination of contract.