

## Huntsworth plc (Huntsworth or the Company) MODERN SLAVERY STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Huntsworth during the year ended 31 December 2019 to prevent modern slavery and human trafficking in its business and supply chains.

### Our Business

Huntsworth plc is the parent company of a healthcare and communications group. Further detail on all our businesses can be found at [www.huntsworth.com](http://www.huntsworth.com)

### Protecting our Staff

Huntsworth is committed to providing its workers (which is deemed to include employees, staff, contractors and freelancers) with safe, legal employment in a stimulating and rewarding environment. We are opposed to any form of slavery and human trafficking (**Modern Slavery**) and strive to ensure that it is prevented from occurring in our business and in our supply chains.

Huntsworth aims to carry out all its business dealings in full compliance with applicable laws and with respect to internationally recognised human rights standards in every location in which we operate.

### Our Policies and Training

We operate a range of internal policies and provide training, which are aimed at ensuring that we always conduct business in an ethical and transparent manner. Workers and directors are required to comply with these policies and undertake the related training. In the context of preventing Modern Slavery, these policies include the following:

- *Code of Ethics Policy and an Ethical Trading Policy*, which together explain the manner in which we behave as an organisation and how we expect our workers, directors and suppliers to act. Each worker and director is responsible for upholding the principles and practices set out within both policies. Our overriding aim is to continue to build and support a culture which values openness, accountability and disclosure;
- *Human Resources policies*, that govern recruitment, equal opportunities and diversity in our workplaces, and which include, where appropriate, background checks for all workers to safeguard against human trafficking or individuals being forced to work against their will;
- *Whistleblowing Policy*, which allows all workers, through a confidential multichannel 24/7 whistleblowing service across the Group, to voice any concerns about treatment of colleagues, or practices within our business or supply chains, without risk of reprisals; and
- *Sanctions Policy*, which makes clear to workers and directors that we will not do business with any organisation or individual that is subject to economic or other sanctions issued by bodies such as the UN, USA Government, UK Government, and the EU.

We regularly review all these policies to ensure that they are fit for purpose and consistent with any changes in legislation and best practice. Workers and directors are made aware of these policies,

including during the induction period upon joining Huntsworth. All workers and directors have access to Group policies via a 24/7 online policy management portal.

### **Our Supply Chains**

Given the nature of our business, we do not have an extensive supply chain network and consider that we are at a low risk of exposure to slavery and human trafficking. Our supply chains include recruitment agencies, cleaning and catering services, IT hardware and software providers, through to office fit out & maintenance services and document retention services.

Huntsworth recognises that it is vital to preserve the highest standards of integrity and transparency within its supply chains, so that those employed within them are not exposed to any form of exploitation. We are therefore selective in our choice of suppliers and conduct the necessary due diligence checks. However, our suppliers may have their own complex supply chains and it is therefore not practicable for us to have direct oversight or management of the working conditions of each supplier. To counter this, where possible, we aim to reduce complexity in our supply chains, so that any weaknesses can be more readily determined and dealt with through a risk-based assessment.

### **Our Effectiveness in Combatting Modern Slavery**

During 2019 we undertook, amongst other matters, the following steps aimed at ensuring that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business:

- Implemented initiatives for onboarding suppliers so that where the Company or any of its subsidiaries enters into a contract with a new supplier, that the relevant supplier formally acknowledges their adherence to modern anti-slavery principles. This was extended to renewals of existing supplier contracts.
- We asked each agency to complete a Supplier Risk Matrix, in order to categorise each of their existing suppliers into a risk category being high, medium low and very low (over 7,000 suppliers were categorised).
- We raised and reinforced awareness of modern slavery and human trafficking. Amongst other matters, all worldwide workers were asked to watch an awareness video on Modern Slavery as part of the annual acknowledgement to comply with all the group's policies.
- The Company's Board of Directors were kept regularly abreast of the work undertaken on modern slavery and human trafficking, and were requested to feed back their comments into the process.

We are not aware of any incidents of Modern Slavery having been notified or identified during the period covered by this statement.

We believe that our culture of openness and accountability, when coupled with our policies and procedures, is effective in combatting the risk that Modern Slavery could be found in our business or in our supply chains. If an instance of Modern Slavery were to be uncovered, Huntsworth believes that it would be well placed to take swift and appropriate remedial action in line with the ethical values that underpin its business. We remain committed to further enhancing and strengthening

effective systems and controls, on an on-going rolling basis, to safeguard against and mitigate any risk of Modern Slavery taking place within our business or supply chains.

This statement was approved by the Board of Directors of Huntsworth plc on 28 February 2020.

Signed

A handwritten signature in black ink, reading "Paul Taaffe". The signature is written in a cursive, flowing style.

**Paul Taaffe**  
**Chief Executive Officer**  
**On behalf of the Board of Huntsworth plc**