

# L515-3

## Anti-Slavery Policy



Haulaway Ltd has a zero-tolerance approach to slavery and is committed to preventing acts of slavery and human trafficking from occurring within both its business and supply chain, and imposes those same high standards on its contractors, suppliers, and other business partners.

### Company structure

Haulaway Ltd works with several companies whose activities form part of its supply chain or business in a number of different countries.

As such, Haulaway Ltd has an extensive supply chain and we procure goods and services in relation to those works. We work with a wide range of different suppliers, subcontractors, and partners each of which will have their own subcontractors, affiliates, and associate entities. Haulaway Ltd therefore is connected to multiple entities (for instance China, USA, and mainland Europe) through numerous contractual relationships across many countries.

### Due diligence processes

- Operate strict procurement processes, ensuring suppliers comply with all applicable laws and standards, including those which relate to the Modern Slavery Act.
- Expect our suppliers to have suitable anti-slavery and human trafficking policies and processes in place within their own businesses and to cascade those policies to their own suppliers.
- Have completed an analysis of assurance information from existing suppliers and partners and followed up where relevant.
- The procurement team follow the advice and guidance in relation to the Modern Slavery Act set out in the Chartered Institute of Purchasing and Supply (CIPS) code of professional conduct.
- Provide regular training in respect of the Modern Slavery Act to our procurement team.
- Have added a specific item relating to the Modern Slavery Act to the agenda of the contract management meetings with suppliers enabling us to be kept informed of any changes.
- Include appropriate terms in our contractual documentation, obliging suppliers and contractors to comply with the Modern Slavery Act and reserving the right for Ordinance survey to audit suppliers and contractors, where we consider it appropriate.
- Encourage staff to identify and report any potential breaches of Haulaway's anti-slavery policy statement.

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- Whistle-blowers are protected through our confidential reporting process.

The above procedures are designed to:

- Identify and assess potential risk areas in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Monitor potential risk areas in our business and supply chains
- Provide adequate protection for whistle-blowers

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Haulway Ltd.'s slavery and human trafficking statement.

Signed: *cholloway*

Name: C Holloway

Date: 05/01/2024