



Modern Anti-Slavery Policy

For the Financial Year End 31st December 2023.

Hilbre Holdings Limited (and all its subsidiary companies, namely CLC Group Limited & CLC Contractors Limited) are committed to taking appropriate steps to ensuring acts of modern-day slavery and human trafficking do not exist within its businesses and supply chains.

This statement has been approved by the Board of Directors and covers all companies within the group. It is signed by Richard Morris, the CEO of AxisCLC..

COMPANY OVERVIEW

Hilbre Holdings Limited and its subsidiary companies form one of the UK's leading property maintenance and refurbishment businesses. We employ over 1100 direct employees operating across fourteen main operating divisions at sites throughout the United Kingdom. We also employ a subcontract supply chain of varying size according to workload or specialism requirements.

POLICIES

Hilbre Holdings Limited and its subsidiaries recognise that slavery, forced labour, servitude and human trafficking is a growing global issue. We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business.

The Group's internal policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

All internal policies are reviewed regularly to ensure they are appropriate, well communicated and promote continued compliance with the Act and other applicable legislation. We have in place the following policies which are relevant to the prevention of slavery and human trafficking in its operations:

CORPORATE & SOCIAL RESPONSIBILITY POLICY

This policy is designed to ensure that the Group of Companies conducts all business responsibly and with the highest ethical and professional standards.

WHISTLEBLOWING POLICY

We encourage all employees to report any concerns related to the activities of the business, including any worries in relation to slavery and human trafficking. The Group whistleblowing policy and procedure are designed to ensure that any matter raised under this procedure will be investigated thoroughly, promptly, and confidentially.

EQUALITY & DIVERSITY POLICY

We are committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination, harassment and victimisation on the grounds of race, sex, pregnancy, maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

RECRUITMENT POLICY

We ensure that the process of recruiting employees is fair, consistent, professional and non-discriminatory to both internal and external candidates.

MODERN DAY ANTI-SLAVERY POLICY

We encourage our employees to consider Anti-Slavery measures when working with potential supply chain members or whilst working in partnership on site. If employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, we encourage reporting it using the recommended channels.



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We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain.

OUR COMMITMENT

In general, The Group considers its supply chain to be at a 'low risk' in relation to modern slavery and human trafficking. Given the nature of the business and the sectors within which we work, there is no significant utilisation of overseas or unskilled labour, being key areas identified as posing a higher risk.

Imports are of a minimal amount; unskilled labour is of a small quantity and all operations are UK based meaning suppliers are already under an obligation to comply with UK law on forced labour.

SUPPLIER ADHERENCE

The Group demonstrates a zero tolerance to slavery and human trafficking. To ensure that all suppliers within the Group's approved supply chain comply with our values and ethics we have staff within our procurement and human resources teams to ensure compliance with this requirement.

We will update our policies and procedures as required to ensure we maintain appropriate safeguards against any mistreatment of persons involved in our supply chain or own internal business.

DAY TO DAY COMBATING SLAVERY AND HUMAN TRAFFICKING

Any suspected incidence of slavery or human trafficking would be immediately reported to the employee Line Manager in the first instance. This would then be investigated and passed the HR or Procurement Manager for review. It would then be dealt with appropriately, which may include terminating commercial relationships, disciplinary action and notifying the relevant authorities.

OUR POLICY ON CHILD LABOUR

We require all our suppliers to adhere to the standards set out by the International Labour Organisation as regards the employment of children and young people. In particular:

- a. Children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 15; and
- b. Those under 18 must not be required to perform hazardous duties.
- c. All WTD legislation will also be adhered to for under 18's.

WHAT WE HAVE DONE IN 2023

1. Carried out Supply Chain Audits as previous years in line with the governance guidance about Covid.
2. Continued to bring awareness amongst all employees during the induction day and Toolbox talks.

WHAT WE WILL DO IN 2024

1. Continue to raise awareness amongst all employees of modern slavery issues through training.
2. Carryout audits of our supply chain through 2024.
3. Continue to revise our diligence process, in particular our Supplier Approval Process making sure that modern slavery and human trafficking are prevalent considerations when assessing to engage with new suppliers.
4. Write to key suppliers to remind them to engage with our expectations of compliance with the Act.



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Overall, we will continue to focus on understanding further our supply chain, identifying risk areas, and increasing awareness amongst all the employees on the issues of modern slavery and the reporting of procedures available to them. We will continue to update policies and procedures as required to ensure appropriate safeguards against any mistreatment of person are in place.

A handwritten signature in black ink, appearing to read "RM", written over a thin horizontal line.

RICHARD MORRIS
GROUP CHIEF EXECUTIVE OFFICER

Policy Owner – Group HR Director –
Maria Northwood

Review Date: 31st March 2025