



UK Modern Slavery Act

Response 2018

HS and TC UK Modern Slavery Act Response 2018

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps HS and TC plc and its subsidiaries have taken to prevent slavery and human trafficking in our business and supply chain.

We are committed to conducting business responsibly and to maintaining and improving systems and processes to reduce the risk of slavery and human trafficking in our business or supply chain.

Company Overview

At HS and TC, our Consultancy helps to protect people and national security, and keeps the Critical National Infrastructure (CNI) and critical information secure.

We are constantly researching for new ways to provide our client base with a competitive advantage across the cyber domain. We employ a skilled workforce in multiple countries and collaborate closely with local partners to support economic development by constructive transference of knowledge, skills and technology.

Governance and Risk Management

The Board has put in place a detailed governance framework which includes our revised Code of Conduct. It sets out how we do business across HS and TC and captures the Company's values, policies and processes; together with clear lines of delegated authority aimed at ensuring all of our staff act in a clear, accountable and consistent way.

Performance and compliance with policies and processes are carefully monitored via the annual Operational Assurance Statement. This is made up of two parts:

- A self-assessment by our business and functional leaders measuring compliance against the Operational Framework and;
- A report showing the financial and non-financial risks for the the relevant business completed by line and functional leaders.

The key financial and non-financial risks are collated and reviewed by the Board to identify the issues showing cumulative risk, or possible repetitional impacts, could occur or be significant.

Responsibility for the effective management of our most significant risks is determined by the Board which has overall responsibility for

determining the nature and extent of the risk it is willing to take. Risk is a regular agenda item at the Board meetings and it views risk as a part of its annual strategy review process. While the risks of modern slavery and human trafficking have been identified as potential risks they are not identified as principal risks for the Company and, as such, we will monitor and continually review the status of this risk.

Our Commitment to Human Rights

Harwood Security and Training Consultancy Limited ("HS and TC") recognises that the respect for human rights is an integral part of its social responsibility as a responsible Consultancy.

HS and TC has fostered and continues to foster an organisational culture that respects dignity and human rights. We believe that conducting business with high ethical standards is fundamental to this culture.

HS and TC is also subject to the requirements of the Modern Slavery Act 2015 and we are committed to ensuring that no modern slavery takes place in our organisation. We also want to prevent workers from being subjected to modern slavery in our supply chains and within the businesses of our partners.

This statement sets out the actions that HS and TC has taken to understand all potential modern slavery risks in relation to its organisation and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its business and supply chains.

This statement relates to actions and activities of the Company during the financial year up to and including 31 May 2018.

Approach and Policies

Given that the Modern Slavery Act 2015 was only recently introduced, our approach to tackling the issue of modern slavery will inevitably evolve over time. We are in the process of introducing an Anti-Slavery and Human Trafficking policy, which reflects our commitment to acting ethically and with integrity in all our business relationships, and sets out the steps that we intend to take to combat modern slavery. The policy will also alert staff to the issue of modern slavery and encourage them to raise concerns about any suspicion of modern slavery in any part of our business or supply chains.

Additionally, we have also updated our '*Supplier Code of Conduct*', which will require all third parties working with HS and TC and its subsidiaries to comply with all labour laws in the jurisdictions where they operate and to take appropriate steps to ensure that there is no slavery or human trafficking in their own supply chains.

Supplier Mapping and Risk Assessment

We work with multiple directly contracted suppliers and partners globally and we recognise the role that they play in supporting responsible business. Therefore, we have begun the process of mapping out our first tier supply chain in order to identify particular risks which require attention. This will lead to an on-going program which will ensure our systems:

- Identify and assess potential risk areas in our supply chains.

- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Going forwards, we intend to work with our suppliers to assist them in identifying any areas of risk in their own supply chains and to mitigate the risk of modern slavery occurring.

Contracts and Procurement

Our contractual and procurement approach has always been to try and include relevant and binding provisions in our key external supply contracts to ensure our suppliers and our partners trade ethically and take appropriate steps to ensure there is no slavery or trafficking in their business. These protections will continue to be included in all key external supply contracts going forwards.

Training and Awareness

To ensure that our key staff understand and are aware of the risks of modern slavery and human trafficking and can assist us in preventing this, both in our business and in our supply chain and the businesses of our partners, we will be providing training to representatives from our board of directors, management team, HR team and procurement team.

HS and TC remains committed to upholding human rights and safety in our supply chain and we will be reviewing our progress and effectiveness in combatting slavery and human trafficking on an annual basis.

This statement was approved by the Board of Directors of HS and TC plc on 28th March 2018

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