

ANTI-SLAVERY POLICY

As a Group, Howard Tenens maintains relationships with many different organisations in its supply chain, as well as employing directly large numbers of people. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chain. The policy below underpins our approach, and will be used to inform our annual Statements on Slavery and Human Trafficking.

Howard Tenens has adopted a statement of our corporate values on the prevention of modern slavery and human trafficking. The values statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with Howard Tenens and/or any associated company, to familiarise themselves with our anti-slavery values and to act at all times in a way which is consistent with these values.

HOWARD TENENS LTD ANTI-SLAVERY VALUES

As part of our culture of good governance, at Howard Tenens Ltd we operate to a set of core values which reflect our relationships with our principal stakeholder groups: customers, manufacturers, shareholders, suppliers and colleagues. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

Our attitude to modern slavery is: zero tolerance.

1. PURPOSE OF THIS POLICY

- 1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Howard Tenens Limited (the “Company”) with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.
- 1.2 As a Group, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

2. STEPS FOR THE PREVENTION OF MODERN SLAVERY

- 2.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other

business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We expect our suppliers to hold their own suppliers to the same high standards.

- 2.2 All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.
- 2.3 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:
 - (i) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
 - (ii) engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
 - (iii) where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
 - (iv) introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- 2.4 From financial year 2017, we will include in the directors' report accompanying our annual financial statements a reference to the Company's Slavery and Human Trafficking Statement, which will be presented on our website during the course of 2018.

3. RESPONSIBILITY FOR THE POLICY

- 3.1 The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.
- 3.2 Managers, supervisors and team leaders are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

4. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Whistleblowing Procedure – direct access to senior leadership

- 4.1 The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure may be found in the Human Resources section on the Company intranet.
- 4.2 In summary, colleagues should approach either their General Manager, equivalent senior manager or a director of the Company. The nature of the complaint will determine the Company's next course of action.

Confidential Feedback Line

Confidential Feedback Line 08702 415 640 (ext 1)

4.3 This line may be accessed by employees or any other person wishing to raise a concern. You should call this line if:

- you suspect a person acting on behalf of Howard Tenens or one of our businesses is seeking to **exploit another in a way which could amount to modern slavery;**
- you suspect that a person acting on behalf of one of our suppliers is seeking to **exploit another in a way which could amount to modern slavery;**
- you have received an approach from a person acting on behalf of Howard Tenens or one of our businesses who has **invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;** or
- you have information that a person acting on behalf of Howard Tenens or one of our businesses or suppliers is **preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.**

4.4 Reports to the Suspicious Activity Confidential Feedback line (“the Line”) are kept in confidence, subject to the need for Howard Tenens to act responsibly and within the law. The source of reports to the Line will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed on our behalf or in any element of our supply chain

Direct Communication

4.5 The Company encourages members of the public or people not employed by us to write, in confidence, to the Company Secretary at Tenens House, Kingfisher Business Park, London Road, Thrupp, Stroud, GL5 2BY.

5. SAFEGUARDS

- 5.1 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 of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.
- 5.2 However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to make themselves known when raising concerns.
- 5.3 Any claims or allegations made which are, however, found to be malicious or vexatious will result in disciplinary action being taken against the individual.

6. COMMUNICATION AND AWARENESS OF THIS POLICY

- 6.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

7. REVIEW

- 7.1 Following its initial adoption, this Anti-Slavery Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Anti-Slavery and Human Trafficking which will be published alongside our 2017 financial results.

Recommend for adoption by the Board

Date of Adoption	January 2018
Next Review:	January 2019