

Modern Slavery Act statement

Statement for the Financial Year ending July 2022

This statement is made pursuant to the Modern Slavery Act 2015 (“the Act”) and comprises our slavery and human trafficking statement.

Introduction

Hartford Consulting Ltd is committed to continually reviewing and improving our practices to combat slavery and human trafficking. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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.

We have a zero-tolerance approach to modern slavery and 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 business or in any of our supply chains.

We are also 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 our contractors, suppliers and other business partners.

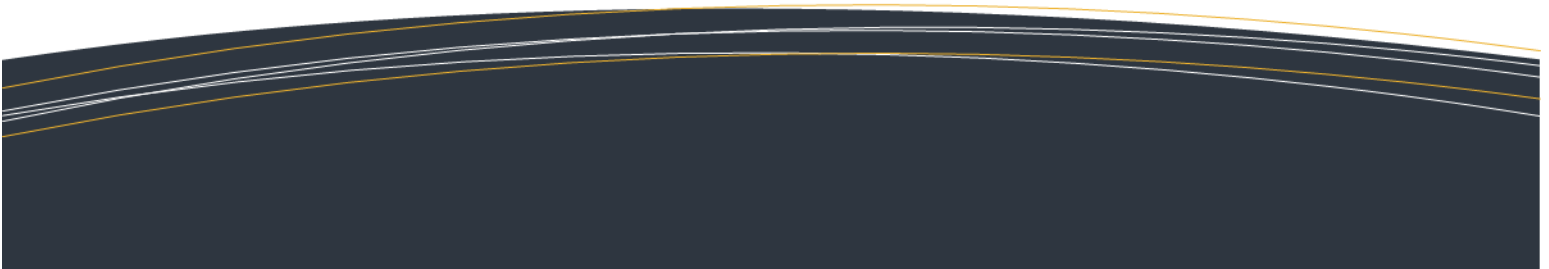
Organisational Policies

As a responsible company, we strive to carry out business activities ethically and with integrity.

In relation to people management, the primary policies relating to ethical working are our code of conduct and supplier code of conduct. Anyone working for or on behalf of Hartford Consulting is expected to uphold the values of the company.

The key requirements of the codes in relation to people are:

- Counter-acting illegal employment;



- Respect for the fundamental human rights of employees; and
- The ability of anyone in our supply chain, at any point, to flag concerns regarding malpractice.

Assessing and Managing Risk

Modern slavery and human trafficking comprise several activities that are contrary to legal or moral conduct. We have reviewed our supply chain and established that any risks that could possibly arise would fall into two categories; Forced Labour, meaning work or service which people are forced to do against their will under threat of punishment; and debt bondage is where people borrow money they cannot repay and are required to work to pay off the debt, losing control over the conditions of both their employment and the debt. With this in mind, we have considered our supply chain and assessed the risks of finding modern slavery issues as being low, as we source from technical and professional service providers from within the UK, and mainly from the professional services sector.

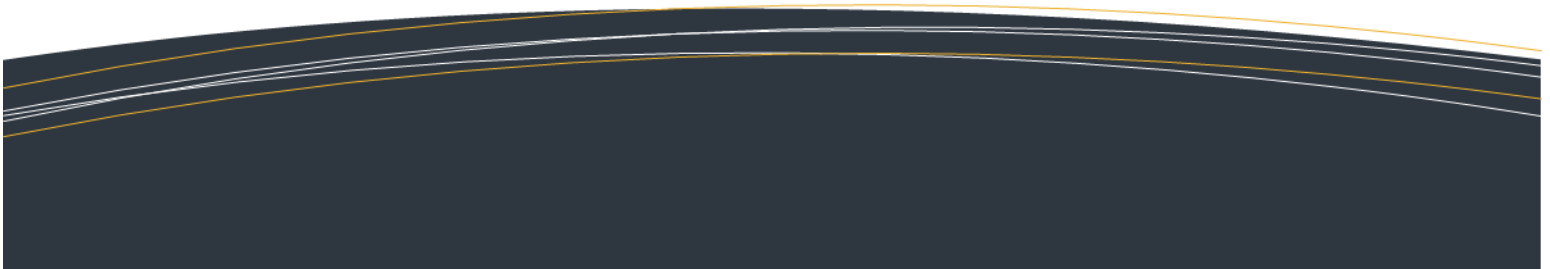
Due Diligence

We pay all employees and on-site contractors better or at least the National Living Wage as defined by the Living Wage Foundation, a process that is reviewed on an annual basis. We have a range of policies, including our Grievance Policy and Whistle Blowing Policy, available to all employees to access and use in the unlikely event that this becomes necessary. All employees and new starters are made aware of their rights and our obligations under the Act and the policies that relate to this.

For third and fourth party suppliers, we only wish to use companies who are reputable and demonstrate a commitment to our values in relation to ethical working practices.

To support effective assessment of our supply chain we have strengthened due diligence questions and requirements of our supplier vetting programme, to focus on fair employment and ethical practices, supported by a supplier code of conduct that we expect all suppliers to sign up to and always comply with in the course of their business dealings with us.

The supplier code of conduct includes a commitment from the supplier to permitting and co-operating with any audit requirement that arises during the course of the relationship.



Training

Taking a risk-based approach we provide awareness training to key personnel who are responsible for procurement of technical services within our property management and facilities management areas of the business.

To ensure that the rest of our principals, employees and workers understand the risks of modern slavery and human trafficking in our supply chains and our business, we provide them with a copy of the Modern Slavery Policy and encourage them to report any concerns to their manager.

Management Commitment

Hartford Consulting is committed to being a responsible business and this is demonstrated through our management team's approach to all aspects of compliance and supporting a policy of continually reviewing our supply chain to identify and resolve any concerns that are found or arise.

This statement has been read by our UK Operations Executive and signed on their behalf by:

Jeff Bateman

CEO

August 2022

