



## 2 Modern Slavery Statement

### 3. Our Processes for Managing Risk

To assess the risk of modern slavery, we will use the following processes in the event of using a third party suppliers:

- When engaging with suppliers, we ask for evidence of their processes and policies including commitments around modern slavery, human trafficking and forced labour.
- We conduct a review of any suppliers' business before entering into a commercial relationship where there is the potential for risk. Any authorised businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

After due consideration, we have identified the following potential risks in our supply chain:

- Significant recruitment levels of migrant workers including, but not limited to, Polish, Romanian, Lithuanian, Latvian, Slovakian, Hungarian and Bulgarian.
- Volatile labour requirements due to retailer requirements resulting in increased recruitment levels.
- Low skilled workforce requirements at some locations resulting in any potential risk of third-party labour exploitation.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We will reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We will require the businesses we work with to address modern slavery concerns in their policies and publish a modern slavery statement should they meet the relevant criteria.
- We will collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area.
- We will ensure that all of our suppliers are members of appropriate industry bodies.
- We plan to work closely with the Gangmasters and Labour Abuse Authority, Local Police Representatives and Stronger Together in order to combat the risk of modern slavery and human trafficking.

Our staff are encouraged to bring any concerns they have to the attention of management.

### 4. Our Performance

As part of monitoring the performance of Hariley Solutions Limited, we aim to track the following general key performance indicators:

- Multiple occupancy checks on any properties with 5 or more occupants
- Duplicate bank account checks on all details provided by workers during registration
- Multiple contact number report to monitor overuse of contact numbers throughout worker information
- Worker welfare questions within registration forms to monitor for potential exploitation
- Feedback questionnaires used to monitor for potential indicators of labour exploitation

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Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our senior leadership team:

- The percentage of suppliers who provide their own modern slavery statements, or where criteria are not met, what modern slavery processes have been implemented
- The percentage of workers supplied from our preferred supplier list
- The level of modern slavery training and awareness amongst our own internal staff
- Number of identified potential cases and from which indicators

We benchmark our indicators against the industry best-practice and carefully consider our indicators, in order to ensure that we do not put undue pressure on our suppliers which might increase the potential for risk

## 5. Our Training

All of our staff receive training and support that is appropriate to their role. In particular:

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters and staff involved in our procurement and supply chains undertake training that includes guidance around modern slavery and human trafficking.

As part of this, our staff are encouraged to discuss any concerns that they have. Training is refreshed regularly.