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		Owner:	Chief Executive Officer	Review:	Annually

INTRODUCTION

The aim of this policy is to mitigate against slavery and human trafficking in H&MV Engineering’s corporate activities, and to ensure our relationships and supply chains are free from labour crime.

As leading specialists in High Voltage Transmission and Distribution systems, the H&MV Engineering and its subsidiaries (the Company) recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Modern Slavery refers to offences of human trafficking, slavery, servitude and forced or compulsory labour.

Human Trafficking involves the recruitment, harbouring or transportation of people into a situation of exploitation through the use of violence, deception, coercion or forced into a situation to work against their will.


RESPONSIBILITIES

It is the responsibility of all stakeholders, internal and external, including the Company’s employees, contractors, sub-contractors and suppliers to maintain the highest ethical standards and eliminate any malpractice.

PROCEDURE

The company aims to conduct all business in an honest and ethical manner and to comply with all applicable legislation and regulations across all territories, bases and locations. The Company is currently active in Ireland, United Kingdom, Norway, Sweden, The Netherlands, Germany, Croatia, Spain and India.

Through a process of risk analysis H&MV engineering has identified the activities which may be at risk of modern slavery and human trafficking within the Company.

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The Company has put multiple procedures in place to safeguard against slavery and human trafficking in its operations globally. While not aiming to cover every scenario the following steps are carried out by H&MV Engineering and to mitigate against labour crime in its operations. This list will be reviewed, monitored and updated on a recurring basis.


- All suppliers and sub-contractors of H&MV Engineering are requested to complete a supplier approval form outlining compliance.
- H&MV Engineering shall supervise compliance and reserves the right to investigate any concerns which may be raised.
- Continuous audits of policy and procedures in relation to Human Trafficking and Slavery will be conducted utilising both internal and external auditors.

RAISING A CONCERN

The Company provides a mechanism for raising concerns and hopes that in the event an employee or subcontractor has knowledge or suspicion of slavery or human trafficking they have a moral and statutory obligation to raise such concerns with their line manager. In the event that the concerned party is not in a position to highlight their concern with their own line manager, they may contact their line manager's manager, or a member of the Company's senior management team.

Any concern can also be raised through the Company's dedicated confidential email system: concerns@hmveng.ie (Ireland & Croatia), concerns@hmveng.co.uk (UK), concerns@hmveng.se (Sweden), concerns@hmveng.no (Norway), concerns@hmveng.de (Germany), concerns@hmveng.nl (The Netherlands), concerns@hmveng.es (Spain) and concerns@hmveng.co.in (India).

These email accounts are monitored by a member of the Senior Management Team. All concerns will be investigated efficiently and promptly and where possible by our independent auditor.

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OUR POLICIES


The Company has a number of procedures relating to employment practices which run in parallel to this policy. The Company operates the following policies that describe its approach to the identification of modern slavery, risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing Policy H&MV Engineering is committed to the highest standards of openness, integrity and accountability, as well as the highest possible ethical standards in all of its practices. To achieve this, it encourages staff to use internal mechanisms for reporting any malpractice or illegal acts or omissions by its employees. We therefore view it as extremely important to have a mechanism in place to enable staff to voice concerns in a responsible and effective manner.

Ethics Policy H&MV Engineering insists on the highest ethical standards when conducting business. Doing the right thing and acting with integrity are two of the driving forces behind H&MV Engineering's great success story. When faced with ethical issues, employees are expected to make the correct professional decision consistent with H&MV Engineering's principles and standards.

Equal Opportunities H&MV Engineering is an Equal Opportunities Employer. As such it is committed to Equality of Opportunity for existing and potential employees. The purpose of our Equal Opportunity/Diversity Policy is to create a workplace which provides for Equal Opportunities for all staff and potential staff and where their dignity is protected and respected at all times.

Recruitment and Selection H&MV Engineering operate a robust Recruitment & Selection Procedure in line with legislation and employment laws. This includes right to work, employment and documentation checks.

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Supplier Code of Conduct H&MV Engineering is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their workers' working conditions. We have a zero tolerance approach to violation of this policy. H&MV Engineering will review the continuation of business with individuals and organisations found to in violation of this policy and reserves the right to terminate business with such suppliers on this basis.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All staff have been notified of this policy.


OUR PERFORMANCE INDICATORS

An indication that the measures/steps we have put in place to mitigate against human trafficking & modern slavery in our operations are sufficiently working will result in:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.


H&MV Engineering will continue to develop and implement the measures mentioned above in respect of our supply chain.

Our approach to modern slavery and human trafficking risk will continue to evolve and we will continue to mitigate these risks through the provisions mentioned above during 2024 and beyond.

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This statement is made pursuant to 54(1) of the Modern Slavery Act 2015 and constitutes our company slavery and human trafficking statement for the current financial year.

Signed  10th April 2024
 Director

Signed  10th April 2024
 Director