



# HPUK POLICY

**Subject**            Modern Slavery                            **Reference**                            2019\_0007

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## Objective

Modern slavery takes various forms, such as slavery, servitude, forced and 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. We have a zero-tolerance approach to modern slavery and 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 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 of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## Scope

This policy applies to all employees at Hutchison Ports (UK) Limited and associated companies of Hutchison Port Holdings Limited in the United Kingdom. It will also be promoted through partnership with all recognised trade unions and representative bodies.

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**Approved by:**

**Date:**

2/4/2019.

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**CEO Hutchison Ports (UK) Limited**

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**Supersedes: Policy 2017\_0002**

# POLICY DETAIL

## Policy Detail Version 1

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### 1. Scope and Purpose of the Policy

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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. We have a zero-tolerance approach to modern slavery and 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 business or in any of our supply chains.
- 1.2 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 of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all employees at Hutchison Ports (UK) Limited and associated companies of Hutchison Port Holdings Limited in the United Kingdom. It will also be promoted through partnership with all recognised trade unions and representative bodies.

### 2. Personnel Responsible for Implementing the Policy

Our Executive Committee has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. The Executive Committee has delegated day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Finance Director.

### 3. Compliance with the Policy

- 3.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.2 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.3 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.4 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or through the "Speak Up" line on (01394) 604422 or internally 4422 and leave a message on the automated service, this is checked regularly by a member of the Executive Committee.

### 4. Communication and Awareness of the Policy

- 4.1 It is the individual responsibility of each employee to ensure that you read, understand and comply with this policy.

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- 4.2 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided to relevant individuals, as necessary.
- 4.3 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.

## 5. Breaches of the Policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 6. Monitoring and Review of the Policy

We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives. This policy will be reviewed at least every 2 years by the Finance Director. Recommendations for any material amendments are reported to the Executive Committee.

## 7. Effective Date

This policy detail comes into effect on 1 April 2019.

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Approved by:



Date:

01/04/2019

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Finance Director

Hutchison Ports (UK) Limited

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Supersedes: Policy 2017\_0002