



Hurricane

Modern Slavery Policy

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0. Signature Sheet

Document content checked and accepted by **Compliance Manager**:

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Date: 1 July 2021

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Position: General Counsel

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Date: 1 July 2021



1. Introduction

1.1 What is Modern Slavery?

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 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.

1.2 Who must comply with this Policy?

This Policy applies to:

- all directors of Hurricane and any of its group companies;
- all employees and third party individuals working within or for the Hurricane organisation;
- all relevant third parties.

An employee includes employees (whether permanent, fixed term or temporary) at all levels working for Hurricane or any of its group companies, and includes officers, seconded workers, casual workers, trainees, volunteers, and interns.

A third party could be any agent, distributor, consultant, contractor, co-venturer, joint venture partner, business partner, vendor, political party, government or public body, including their personnel, advisors and representatives, which conducts activities for or on behalf of Hurricane or is associated with Hurricane or any of its group companies.

A relevant third party is a third party that is authorised by Hurricane or any of its group companies to carry out activities on behalf of Hurricane or any of its group companies in a representative capacity but does not include third party individuals.

Third party individuals include individuals employed by a third party and who work within the Hurricane organisation such as independent contractors, agency and seconded workers.



2. Responsibility for the Policy

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The compliance manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels 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 in supply chains.



3. Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

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.

You must notify the compliance manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.

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 line manager, the Compliance Manager, the General Counsel or through the independent Whistleblowing provider.

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. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook.



4. Communication and Awareness of this Policy

We provide training to all directors, employees and any third party individuals who work within the Hurricane organisation to reinforce their knowledge of the policy. Training is administered via an online portal – records of this training are monitored and maintained within the portal.

Our commitment to addressing the issue of modern slavery in our business and supply chains 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 this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.