

# Modern Slavery and Human Rights Statement

*Modern slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks in our business and in the wider supply chain. Employees are expected to report concerns and management are expected to act upon them. Similarly, we seek to avoid causing or contributing to adverse human rights impacts that are directly related to our internal operations and services through our business relationships. Our human rights responsibilities begin at home with how we treat our own employees and then extend across our markets to include our clients, external partners, and community stakeholders.*

**Modern slavery** is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or 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. **Human rights** are the universal rights that every human being is entitled to enjoy and to have protected. They are most appropriately defined as those rights that require us to treat others as we ourselves would want to be treated, and which protect us – as individuals and groups – from abuses of power.

This document sets out the policy of Hydrock Holdings Limited (Hydrock) with the aim of the prevention of opportunities for modern slavery or human rights violations to occur within its businesses or supply chain. This policy's use of the term 'modern slavery' has the meaning given in the Act. Hydrock is voluntarily publishing an annual statement of intent which is displayed on our corporate website and intranet in compliance with the Modern Slavery Act.

## *Our business*

Hydrock is a multi-disciplinary engineering consultancy operating throughout the UK.

## *Organisation structure*

Hydrock Holdings Limited has three trading subsidiaries: Hydrock Consultants Limited; Complete Design Partnership Limited and; Fore Consulting Limited. Our head office is in Almondsbury, Bristol. We have a total of 22 offices and numerous worksites in England, Wales and Scotland.

## *Our supply chains*

Our supply chains include one or more companies in the following categories:

- » Recruitment agencies
- » Temporary/agency staff
- » Various professional services
- » Plant and equipment hire
- » Utilities
- » Raw and manufactured materials and chemicals

- » Suppliers of safety clothing and building supplies
- » Office equipment
- » Communications and IT equipment services

As part of our Supplier Risk Assessment process and ongoing monitoring of our supply chain, we carry out regular reviews to ensure suppliers are assessed and the information held on our supply base is kept up to date.

## *Our policies on modern slavery and human rights*

We are committed to ensuring that there is no modern slavery (which includes human trafficking) or human rights violations in our supply chains or in any part of our business.

Our Anti-Slavery and Human Rights Policy reflects our commitment to acting ethically and with integrity in all our business relationships. Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our supply chains and committing to advancing human rights, not only through the work we deliver but also from how we deliver it.

## *Due diligence processes for slavery and human rights*

As part of our initiatives to identify and mitigate risk:

- » We require all of our contracted and sub-contracted workers to affirm awareness of their responsibilities under the Modern Slavery Act and require them to adhere to all good business practices that ensure compliance;
- » Where possible, we build long-standing relationships with local suppliers and customers and make clear our expectations of business behaviour;
- » We expect our suppliers to have suitable anti-slavery and human trafficking and human rights policies and processes in place. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (nor every other participant in the chain) to have a direct relationship with all links in the chain; and
- » We have in place systems to encourage the reporting of concerns and the protection of whistle-blowers.
- » We are committed to undertaking our operations to the highest standard of ethics and in accordance with our values.
- » We respect all fundamental human rights and are guided in the conduct of our business by the provisions of the United Nations Universal Declaration of Human Rights, the International Labour Organisation's (ILO) core labour standards and national legislation
- » We will ensure that no form of discrimination is practiced in any area of our business including, recruitment, compensation, promotion, training, termination or retirement based on age, disability, gender, gender reassignment, marital status or civil partnership, pregnancy and maternity, race, religion and belief, or sexual orientation.
- » We recognise our employees' right to join trade unions.

- » We are committed to ensuring that our employees are able to work in an environment free of physical, psychological or verbal abuse, the threat of abuse and sexual or other harassment and, accordingly such actions are forbidden.
- » All our employees will work in an environment that is both safe and healthy, in line with national Health and Safety Policy
- » All employees shall receive an appropriate level of training to enable them to perform their duties and be provided wages and benefits that meet national standards.

## *Supplier adherence to our values*

We have zero tolerance to modern slavery (including human trafficking) and human rights violations. We expect all those in our supply chain and contractors will comply with our values. The Directors are responsible for compliance in their respective offices / teams / sites and for their supplier relationships.

## *Training*

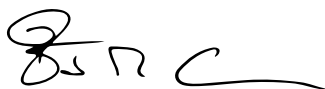
To ensure a high level of understanding of the risks of modern slavery and human rights in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on both subjects.

## *Our effectiveness in combating slavery and human rights violations*

We use the following performance indicators to measure how effective we have been to ensure that slavery and human rights violations are not taking place in any part of our business or supply chains:

- » Monitoring of payroll systems.
- » Awareness amongst employees and Individuals is fundamental to ensuring that the objectives of this Policy are met and the Company is committed to training and communicating its approach to human rights as part of the implementation of this Policy.
- » Levels of communication and personal contact with next links in the supply chains and their understanding of, and compliance with our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Hydrock's slavery and human trafficking statement for the financial year ending 31st March 2024.



Dr Brian J. McConnell, CEO

June 2023