

# Modern Slavery and Human Trafficking Policy Statement

## Our Approach

Within the European Convention on Human Rights, Article 4 states that;

*'no one shall be held in slavery or servitude and no one shall be required to perform forced or compulsory labour'.*

The Modern Slavery Act 2015 (the Act) creates offences relating to holding another person in slavery or servitude, by requiring another person to perform forced or compulsory labour and human trafficking. In this respect, human trafficking is where a person arranges or facilitates the travel of another person with a view to the transported person being exploited, ie through slavery, servitude, forced or compulsory labour.

Hague Group (Hague) seeks to ensure that these principles are pursued across its business and that our suppliers also commit to the same ethical standards.

Hague is committed to conducting business ethically and responsibly. We also seek to ensure that our suppliers and their supply chains operate to those same high standards, including those in relation to employment practices, workplace conditions and, more specifically, the prevention of forced and trafficked labour. This is upheld through the company's policies and processes and is supported by the Directors and Leadership Team.

Hague does not condone or tolerate the use of slavery, slave labour or servitude in the manufacture of products it markets and will not accept products or services from suppliers that utilise or condone any such illegal practices, wherever in the world they occur. This policy sets out how Hague will make efforts to eradicate human trafficking and slavery from both our own business and also from its supply chains.

Hague and its suppliers are required to confirm that they comply with the Act by agreeing to be bound by Hague Modern Slavery & Human Trafficking Policy. This requires their commitment to take necessary steps to ensure that any materials incorporated into the products they provide have been sourced from suppliers who also comply with the laws regarding human trafficking and slavery in the country or countries in which they operate.

## Aims and Objectives of the Policy

Hague takes its responsibilities seriously and is committed to promoting ethical and lawful employment practices, including the provision of a work environment that is free from slavery, servitude, forced or compulsory labour and human trafficking. It also requires its suppliers, sub-contractors and business partners to follow these practices worldwide.

## **Overview**

Hague and its suppliers, contractors, sub-contractors and agents shall:

- Not use forced or compulsory labour (i.e. work or service that a worker provides involuntarily, or under threat of penalty, including forced overtime where such has not been approved by collective bargaining).
- Ensure that the terms of employment are voluntary and freely entered into by the worker, and that personal documents such as passports are not withheld.
- Ensure that workers are not charged a fee in association with their recruitment and that they are not required to lodge security payments or deposits.
- Comply as a minimum with age requirements prescribed by applicable laws in the country in which they operate.
- Remunerate its workers with wages and benefits that meet or exceed the legally required minimum in the country in which they operate.
- Abide by any applicable law concerning maximum hours of work prevailing in the country in which they operate.

### **Guidelines 1 - Business Structure and Supply Chains**

Hague is a print management business operating in the UK with a simple structure of four businesses reporting into the parent group. One of the businesses is a print business in Australia. We source the vast majority of print from established UK print businesses, and we buy materials, largely paper, from renowned European paper manufacturers. We also buy Ribbons, Holograms, Toners, Plastic Bags, POS, Promotional Products, and other items as required by our clients.

### **Guidelines 2 - Organisational Policies**

Hague has organisational policies in place, honed over years of experience and managed by our personnel department. We are a reputable employer with a heritage of 45 years of positive employment practice behind us. We exceed all current employment legislation requirements and abide by all applicable law with regard to Modern Slavery and Human Trafficking laws.

### **Guidelines 3 - Due Diligence**

Hague is developing further plans to strengthen our capabilities with regard to auditing and monitoring the activities, improvements and behaviours of our suppliers in this regard.

### **Guidelines 4 - Accessing and Managing Risk**

Hague has adopted risk assessment policies that are proportionate to our size, the nature and the location of our business as well as the supply chains we use. We believe there is limited risk in the sectors and markets in which we operate but we are committed to verify this position as our policies develop and strengthen.

## **Guidelines 5 - Performance Indicators**

Hague will measure performance against the objectives of the policy and record developments in our systems, the results of which will be included in next year's annual statement.

## **Guidelines 6 - Training**

Hague has invested in new training of Modern Slavery awareness through i-Hasco via one-on one interactive training sessions with all members of staff to promote best practice guidelines for complying fully with our obligations. We also include all new recruits, in this training, as part of their induction process.

## **Responsibility for Implementing this Policy**

A named main board Director is responsible for creating, implementing and managing the task of introducing the systems to support the promotion of ethical and lawful employment practices internally and throughout the Hague supply chain.

Our activities to promote lawful employment practices will be measured regularly through a forum within our regular leadership meetings, changes and updates to the policy may be made in order to apply latest best practice approaches and as a minimum there will be an annual statement update on before each anniversary of the last statement, as prescribed by the Government guidelines.

Hague employees with procurement responsibilities will be insistent on high standards of business integrity from our approved suppliers. They will issue suppliers with the Hague Modern Slavery and Human Trafficking Policy which sets out our stringent supplier requirements. A reasonable opportunity will be afforded to suppliers to ensure that any steps necessary to achieve Hague's policy standards, which they could not reasonably have known beforehand, are rectified. If suppliers unreasonably refuse Hague the facilities to undertake an audit, fail an audit or are found to have engaged in human trafficking and/or slavery they will have their supply agreements terminated on the grounds they have breached that supply agreement.

All employees are required to adhere to the requirements of this policy and exhibit high standards of business integrity avoiding any conduct which may be brought into question. All instances of non-compliance must be reported to the relevant business area and escalated to the Leadership Team if deemed necessary.

Hague's compliance with this policy shall be monitored through an internal audit process. Suppliers must be able to demonstrate compliance with Hague's Policy requirements at the request and to the satisfaction of Hague, who shall upon reasonable notice, be entitled to undertake periodic audits to ensure compliance with this policy.

Hague will register this statement on the Government's Modern Slavery Registry each year.

Dated	6 <sup>th</sup> January 2025
Director Responsible for this Statement	Nathan Wain
Position in Company	Company Director
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Next Formal Statement Update Before	6 <sup>th</sup> January 2026