

Modern slavery and human trafficking policy

Hanning Homes is committed to ensuring that slavery, servitude, forced labour, and human trafficking do not occur within our organization, our supply chain, or the broader care industry. We are dedicated to providing a safe, ethical, and supportive environment for our residents, staff, and suppliers, respecting human rights and promoting ethical standards throughout our operations. This policy is drafted in alignment with the Modern Slavery Act 201

Scope of Policy

This policy applies to all employees, contractors, suppliers, and partners of Hanning Homes. It outlines our commitment to preventing modern slavery and human trafficking and establishes procedures for identifying and addressing any associated risks.

Our Commitment

1. Zero Tolerance Approach

Hanning Homes operates a zero-tolerance approach to modern slavery in all forms. We are committed to taking all reasonable steps to prevent any form of slavery, servitude, forced labour, or human trafficking within our organization and our supply chain.

2. Ethical Treatment of Employees and Residents

We recognize our responsibility to treat employees, residents, and their families ethically, with dignity and respect. We adhere to strict hiring practices that ensure all employees work voluntarily and with fair compensation, and we promote safe working conditions.

Our Supply Chain

We recognize that modern slavery and human trafficking can affect any industry, and we commit to working only with suppliers who share our values. We work with suppliers who:

- Operate ethically and follow all applicable labour laws.
- Prohibit the use of forced labour, slavery, or human trafficking.
- Provide fair working conditions, wages, and hours to their employees.
- Demonstrate transparency and accountability in their operations.

Policies and Procedures

1. Due Diligence and Risk Assessment

We conduct thorough due diligence on all suppliers, contractors, and third-party

partners to assess risks associated with modern slavery and human trafficking. This includes:

- Risk assessments of suppliers, especially those in higher-risk sectors or geographies.
- A review of supplier policies, practices, and compliance records related to labour rights.
- Periodic audits and site visits to verify compliance.

2. Employee Awareness and Training

We provide training to all employees to raise awareness of modern slavery and human trafficking, ensuring they understand:

- The signs of modern slavery and human trafficking.
- Reporting procedures and steps they can take if they suspect any such issues within our organization or supply chain.
- Our commitment to ethical employment practices and fair treatment of workers.

3. Reporting Concerns and Whistleblowing

We maintain a confidential and secure whistleblowing policy to encourage employees and third parties to report concerns about unethical practices or suspicious activities related to modern slavery or human trafficking. Reports are taken seriously and are investigated promptly, with appropriate action taken as necessary.

4. Remediation and Accountability

Should we identify any incidence of modern slavery or human trafficking within our supply chain or operations, we commit to addressing it swiftly and effectively. Actions may include:

- Termination of relationships with suppliers or contractors found in violation of this policy.
- Cooperation with law enforcement and regulatory bodies to ensure compliance and accountability.
- Support for affected individuals to ensure their safety and recovery.

Responsibility and Review

The board of directors and senior management of Hanning Homes hold overall responsibility for this policy, ensuring its effectiveness and that our commitments are

met. This policy will be reviewed annually and updated as necessary to reflect changes in legislation, best practices, and organizational growth.