



# HCUC CORPORATION

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

HCUC Corporation is committed to preventing slavery and human trafficking in its corporate activities, and to ensure that its supply chains are free from slavery and human trafficking.

We are working towards understanding all potential modern slavery risks related to the Corporation business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within our own business and our supply chains.

**This statement relates to actions and activities during the financial year  
1 August 2020 to 31 July 2021.**

### Relevant policies

HCUC operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policies** encourage all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation.
- **Employee code of conduct** makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct** HCUC Corporation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Procedures ensure that suppliers demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **Recruitment/Agency workers** HCUC Corporation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

The Corporation will undertake due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Please see below, Modern Slavery in the Supply Chain form.

### Corporation approval

A handwritten signature in black ink, appearing to read 'N. C. Davies'.

**Nicholas Davies**  
**Chair of Corporation**

This statement has been approved by the Corporation in December 2020. The statement will be reviewed and updated annually.



## MODERN SLAVERY IN THE SUPPLY CHAIN

### SUPPLIER QUESTIONNAIRE

**Contracting Authority Name:** \_\_\_\_\_

**Procurement for:** \_\_\_\_\_

Below is a list of pre-award Modern Slavery Supply Chain questions. The answers/response to these questions will be assessed and scored in line with the relevant procurement taking place. These scores will be added to the overall tender evaluation scores and a final score used to help aid the award decision. Not all questions will be as applicable to each supplier as this depends upon the category of procurement, and the diversity of the supply chain involved. Please answer each question as fully and as honestly as possible. Clearly, a company's turnover does influence the need to have Modern Slavery policies in place. However, if a question is deemed as not applicable, please state 'N/A' and add some commentary to confirm why it is not applicable for your organisation.

**Name of Organisation:**

\_\_\_\_\_

**Name & Position held of person completing this questionnaire:**

\_\_\_\_\_

**Date completed:** \_\_\_\_/\_\_\_\_/\_\_\_\_

The following three questions are to be answered by **ALL** tenderers:

1. Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?

Yes  No

2. If you have answered 'Yes' to question 1, are you compliant with the annual reporting requirements contained within Section 54 of the Act?

Yes  Please provide the relevant url: \_\_\_\_\_

No  Please provide an explanation: \_\_\_\_\_

\_\_\_\_\_

3. If you have answered 'No' to question 1, and you have opted to apply the definition or part of this within your organisation voluntarily, please provide further details:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Please answer the following questions and provide evidence &/or a statement to affirm your organisations position, any action taken or in place to substantiate your response:**

Questions:	Organisations should :-	Answer:
1	Provide evidence that your modern slavery statement has the approval of your Board of Directors (or equivalent management body) and signed by a director (or equivalent) (Part 6 of the Act)	
2	Provide evidence that your policies in relation to slavery and human trafficking are in place (Part 5 of the Act)	
3	State the action taken/planned to tackle modern slavery and human rights abuses within its organisation and the supply chains that will deliver the contract (Part 4 of the Act)	
4	Provide evidence/statement of compliance with all applicable labour/employment laws in delivering the contract	
5	Provide evidence/statement it is not subject to any ongoing investigations or charges in relation to modern slavery and human rights abuses in respect of the workers and supply chain that will deliver the contract	
6	Provide evidence/statement it is not aware of any ongoing investigations or charges within its supply chain for the contract in relation to modern slavery and human rights abuses	
7	Disclose its human rights due diligence processes in respect of the workers and supply chain that will deliver the contract	
8	Provide details of the provision of training on modern slavery and human rights abuses for employees and personnel with responsibility for supply chain management in respect of the workers and supply chain that will deliver the contract	
9	Provide a statement which identify sourcing geographies where it will deliver services or manufacture goods for the contract where there is a high risk of human rights abuse	
10	Provide a statement of the number of workers employed and on what basis (e.g. direct, agency staff etc.) to deliver the contract	
11	Provide evidence/statement that workers who will deliver the contract are aware of their rights and have employment contracts in place	
12	Describe how it will commit to fair working practices for workers engaged in the delivery of the contract (including any agency or sub-contracted workers)	

13	Provide evidence/statement that all workers delivering the contract are paid a fair rate of pay, (in line with relevant national context) and that this is not undermined by excessive charges for accommodation and transport etc	
14	Evidence their policy clearly stating the minimum age for employment for any workers who will deliver the contract is in line with national law or international minimum standards, whichever is higher	
15	Evidence the company has a zero-tolerance policy on violence, exploitation and abuse of children, including but not limited to sexual exploitation, applicable to any workers or supply chain workers who will deliver the contract	
16	Provide a statement on whether workers are charged for items which are necessary for them to perform their role e.g. uniforms, Personal Protection Equipment etc. in delivering the contract	
17	Provide evidence/statement whether workers who will deliver the contract are free to leave to find work elsewhere	
18	Provide evidence/statement that no worker who will deliver the contract has had to pay for employment	
19	Provide evidence/statement that passports of the workers who will deliver the contract are not retained	
20	Provide evidence/statement that workers who will deliver the contract are free to join a Trade Union/collective agreement	
21	Provide evidence of an effective whistleblowing/grievance mechanism is in place for workers and supply chain workers who will deliver the contract	
22	Provide evidence/statement of how products are tracked to source and that all the relevant supply chain has the same level of tracking and compliance to your company's policies	
23	Provide evidence/statement of the recruitment policy used or will be used to recruit the workers who will deliver the contract	
24	Provide details of the use of recruitment agencies which were used or will be used to recruit the workers who will deliver the contract and the due diligence undertaken on them - are they reputable?	
25	Describe how your recruitment policy prohibits the practice of worker-paid recruitment fees e.g. adoption of the Employer Pays, Principle a policy of no worker-paid recruitment fees in relation to any worker who will deliver the contract.	

<b>FOR INFORMATION</b>	<b>In assessing answers, the contracting authority will be considering how your organisation manages its own Modern Slavery Policy Performance / KPIs and Measures: (some examples are listed below):</b>
	Requiring commercial and frontline staff to complete annual training on modern slavery
	Participating in the Modern Slavery Assessment Tool (or equivalent) to monitor supply chains, completing this on an annual basis throughout the life of the contract to measure progress
	Requiring new staff, especially recruiting officers and commercial staff, to be trained on modern slavery within 3 months of joining the organisation
	Reporting any suspected modern slavery violations to an Executive Director immediately upon detection and investigating the reports within 48 hours
	Completing a given number of supply chain audits
	Developing and updating due diligence plans and providing data
	Percentage of business partners (clients, portfolio companies, contractors or suppliers) audited in past year
	Number of workers spoken to confidentially without a manager present during audits in the past year
	Number of identified non-compliances related to forced labour in audits
	Percentage of corrective actions related to forced labour successfully closed/remedied in agreed timeframe
	Number of repeat non-compliances on forced labour from individual business partner in past year
	Number of reports received from business partners related to modern slavery in past month
	Percentage of identified modern slavery risks addressed through collaboration (eg with trade unions and government) in past year
	Number of business partners (eg clients, portfolio companies, contractors and suppliers) trained on modern slavery in past year
	Number of complaints of forced labour received through grievance mechanisms in the past month
	Percentage of complaints resolved in allocated timeframe in the past year
	Number of best practices shared and scaled more widely in the past year
	Percentage of workers who receive information about their employment rights in a language they understand
	Percentage of workers who have paid a fee to secure employment in the past month
	Percentage of workers who receive induction on workplace rights
	Percentage of workers who are members of an independent democratic trade union
	Identification of high-risk geographies and sectors for priority due diligence on modern slavery
	Percentage of business partners that have a policy addressing modern slavery
	Number of business partners that have cascaded requirements on modern slavery with their third parties & supply chain
	Worker feedback on working conditions in staff surveys