

1. Introduction

Hive Procurement Ltd (“Hive”) is a UK-based company specialising in procurement, supply-chain management and coordination of services such as **waste recycling, demolition and associated trades** for public and private sector customers.

We recognise that our activities and supply chains, particularly in **construction, waste and labour-intensive services**, can carry a heightened risk of modern slavery and human trafficking. Hive has **zero tolerance** for any form of:

- Slavery or servitude;
- Forced or compulsory labour;
- Human trafficking;
- Exploitation of children, or any work that is harmful to their health, safety or development.

We are committed to acting ethically and with integrity in all business dealings and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our own business or in any of our supply chains.

2. Our Business and Supply Chain

Hive operates primarily in the UK and works with:

- Manufacturers, distributors and wholesalers of construction and maintenance materials;
- Waste and recycling contractors;
- Demolition and clearance specialists;
- Logistics providers;
- Labour providers and specialist subcontractors.

These sectors can involve lower-paid, temporary and migrant workers and complex supply chains, which require **active management** of modern slavery risks.

3. Governance and Responsibility

- The **Board of Directors** has overall responsibility for this Policy and for ensuring Hive complies with its legal and ethical obligations.
- The **Managing Director** is the named lead for Modern Slavery and will:
 - Oversee risk assessment and due diligence processes;
 - Review and approve this Policy annually;
 - Report any serious issues to the Board.
- Managers are responsible for implementing this Policy in their areas, particularly in procurement, supply chain, operations and HR.
- All employees, workers and contractors are required to **read, understand and comply** with this Policy and to report concerns.

4. Policies Supporting our Approach

This Policy should be read alongside:

- Recruitment, Vetting & DBS Policy
- Subcontractor & Supply Chain Management Policy
- Whistleblowing / Speak Up Procedure (if separate)
- Anti-Bribery & Corruption Policy
- Equality, Diversity & Inclusion Policy
- Health & Safety Policy

5. Risk Assessment

Hive will conduct **risk assessments** to identify areas of highest modern slavery risk, taking into account:

- Type of goods and services (e.g. demolition, waste, labour supply, high-volume procurement).
- Country of origin and known sector risks.
- Use of subcontracting and labour providers.
- Worker characteristics (e.g. migrant workers, low-skilled labour, seasonal work).

Risks will be reviewed **at least annually**, and more frequently if we enter new markets, categories or geographies.

6. Due Diligence in Our Business and Supply Chain

6.1 Recruitment & Employment (Hive's own workforce)

Hive will:

- Use **legitimate recruitment channels** and never charge recruitment fees.
- Verify the **identity and right to work** of all staff.
- Ensure terms of employment are **voluntary**, written in clear language, and compliant with UK employment law (including minimum wage, working time, rest and holiday entitlements).
- Provide staff with a means to raise concerns confidentially.
- Prohibit retention of passports or important personal documents by Hive or its agents.

6.2 Suppliers, Contractors and Labour Providers

For higher-risk suppliers, contractors and labour providers, Hive will:

- Conduct **pre-qualification checks** that may include:
 - Modern slavery / human rights policies and statements;
 - Evidence of management systems and training;
 - Membership of recognised schemes where relevant (e.g. SSIP, labour-provider compliance schemes).
- Include appropriate **contract clauses** requiring compliance with:
 - The Modern Slavery Act 2015;
 - All applicable labour and human rights laws;

- Hive's Modern Slavery requirements.
- Require suppliers to **cascade** equivalent standards to their own supply chains.
- Where appropriate, request and review evidence such as:
 - Worker contracts and pay records;
 - Audit reports or self-assessment questionnaires.
- Reserve the right to investigate and, where necessary, **terminate contracts** with suppliers who fail to meet our standards or to take remedial action.

7. Training and Awareness

Hive will:

- Provide **modern slavery awareness training** to staff whose roles involve procurement, supply chain management, contract management, or HR.
- Include modern slavery awareness within induction for new starters.
- Circulate updates and guidance on emerging risks and good practice to relevant staff.

Training will cover:

- What modern slavery and human trafficking are;
- Typical indicators and warning signs;
- Higher-risk sectors and geographies;
- How to raise concerns and the support available.

8. Reporting Concerns

All staff, suppliers and other stakeholders are encouraged to **raise concerns at the earliest opportunity** if they suspect modern slavery or human trafficking may be occurring in Hive's business or supply chain.

Concerns can be raised via:

- Line manager or contract manager;
- Managing Director; or
- [If you have / add one] A confidential whistleblowing channel.

We will:

- Take all reports seriously;
- Investigate promptly and fairly;
- Take appropriate action, which may include: engagement with suppliers, remediation for affected workers, reporting to authorities and termination of relationships.

Staff can also report concerns externally via:

- **Modern Slavery & Exploitation Helpline:** 08000 121 700
- **Crimestoppers:** 0800 555 111
- **Police (emergency):** 999

We will ensure that **no one suffers any detriment** for refusing to engage in modern slavery, or for reporting a genuine concern in good faith.

9. Measuring Effectiveness

Hive will monitor the effectiveness of this Policy through:

- Number and outcomes of modern slavery-related concerns or incidents reported;
- Completion of risk assessments and supplier due diligence;
- Training completion rates for relevant staff;
- Feedback from suppliers and clients on our approach.

Where necessary, we will update our controls and processes to strengthen our response.

10. Review and Approval

This Policy / Statement will be:

- Reviewed **at least annually** or sooner if legislation, guidance or Hive's risk profile changes.
- Approved by the Board of Directors.

This Policy was approved & authorised by:



Lee Victory
Director
29th October 2025.