



Modern Slavery Act 2015 Statement

Latest Revision: 15th April 2020

HFX Modern Slavery & Human Trafficking Statement - 2019/2020

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out steps HFX has taken and is continuing to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

About HFX

hfx, a Smart Business Investments Limited (SBI) group company, started business in the UK in 1971. Headquartered in Codicote, Hertfordshire and with service and support centres in Letchworth, Birmingham and Edinburgh. We introduced the concept of flexible working hours to the UK in 1971 and "Flexitime®" is our registered trademark.

With almost 50 years in workforce management we understand this market very well. Over the years we have worked with many organisations including Government (local and national), NHS (as part of the National Electronic Staff Record Project), Manufacturing, Logistics, Leisure & Retail industries.

Our commitment to the principles of the Modern Slavery Act 2015

HFX is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal-opportunities employer, HFX is committed to creating and ensuring a non-discriminatory and respectful working environment for its staff. HFX wants all its staff to feel confident that they can expose wrongdoing without any risk to themselves.

HFX recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.

HFX does not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. HFX maintains the following policies which are accessible to all staff via the HFX intranet:

- Code of Conduct
- An Ethics Policy
- Whistleblowing policy
- Bullying and Harassment policy
- Diversity & Inclusion policy
- Recruitment and Selection policy

Our supply chain

Due to the nature of our business, HFX assess itself to have a low risk of Modern Slavery in our business and supply chains.

Our supply chains are limited and we procure goods and services from a restricted range of UK and overseas suppliers.

Embedding the principles

The principles will continue to be embedded by the following activities:

- Provide awareness training to staff on the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensure that consideration of the modern slavery risks and prevention are added to HFX' policy review process as an employer and procurer of goods and service.

- Ensure HFX procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Continue to take action to embed a zero-tolerance policy towards modern slavery.
- Ensure that staff involved in buying/procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

This statement has been approved by the HFX Chief Executive Officer and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2020. This statement will be reviewed and updated annually.