



Modern Slavery Statement

HPC plc is committed to driving out acts of modern day slavery within its own business and that within its supply chain. We acknowledge that we all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Employees are expected to report concerns and management are expected to act upon them.

The organisational structure of the business is a family owned private business with a turnover in excess of £36m and comprises of two divisions: Precision Engineering and Compressed Air Systems. The company's head office is in Burgess Hill with five centres across the UK.

The supply chain to HPC Precision Engineering provides raw materials, machined parts and sub-contract processes, mainly sourced from UK and mainland Europe. HPC Compressed Air Systems supply chain consists predominately of compressed air equipment manufactured in Germany with other ancillary equipment and services being sourced through UK suppliers.

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of our initiative to identify and mitigate risk;

- Where viable, our sourcing policies will limit our supply chains to UK or EU sources as this is clearly understood to limit any risk of encountering such issues
- We will ensure that all team members have an obligation to familiarise themselves with the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented
- Where possible we build long standing relationships with suppliers and customers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The Company Directors and Senior Management shall take the responsibility for implementing the policy statement, its objectives and shall provide adequate resources (training etc.) to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chain.

We use the following processes to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of supplier / customer audits; and
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the current financial year to 31 August 2019.

Ian Curtis, Chief Executive

1st October 2018