



Modern Slavery Statement

HPC plc are committed to driving out acts of modern day slavery within its own business and where possible 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. This statement is for HPC Financial year ending 31-8-2025.

The organisational structure of the business is a family owned private business with a turnover in the tens of millions. The company's head office is in Burgess Hill with four centres across the UK.

The supply chain to HPC comprises predominantly of Compressed Air equipment from our partner in Germany there are other components and processes, sourced mainly from UK and mainland Europe with other ancillary equipment and services being sourced through UK suppliers without complex supply chains.

Our modern 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.

Modern slavery includes the following definitions

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an Employer through mental or physical abuse of the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement

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. This is carried out by online training.
- Where possible we build long standing relationships with suppliers and customers.
- 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 expect our supply chain to confirm with all regulations of the country that they operate in.
- 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 following policies are available to all staff through the HPC library drive:

- Company rules
- HPC Fraud, Anti Bribery & Ethical behaviour Policy
- Bullying and harassment policy
- Equality and Diversity policy
- Whistleblowing policy

Embedding the principles

We will continue to embed the principles through providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery

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or human trafficking, ensuring staff involved in procurement activity are aware and receive training on modern slavery and ethical employment practices. Training is conducted through our online partner

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 and as far as possible our supply chains:

- Supplier approvals and review procedure.
- 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.

Jason Morgan
Chief Executive

This Statement will be reviewed and updated as required within 6 months of our financial year end.

Date of Review Oct 2025
Date of Next Review Oct 2026