



Hive 360 Anti-Slavery and Human Trafficking Policy

POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Hive 360 has a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the business or in any part of the supply chains.

Hive 360 is committed to ensuring there is transparency in the business and in their approach to tackling modern slavery throughout their supply chains. Hive 360 expect the same high standard from all of their contractors, suppliers and other business partners. As part of the contracting processes, Hive 360 includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Hive 360 expects that their suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for Hive 360 on their behalf in any capacity, including employees at all levels, contractors, external consultants, third-party representatives and business partners.

RESPONSIBILITY FOR THE POLICY

The Managing Director of Hive 360 has overall responsibility for ensuring this policy complies with Hive 360's ethical obligations, and that all those under their control comply with it.

The Compliance Manager of Hive 360 has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Supervisors at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on the issue of modern slavery.

HIVE360 Ltd

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COMPLIANCE WITH THE POLICY

All employees of Hive 360 will ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for Hive 360 or under their control. Any activity that might lead to, or suggest, a breach of this policy should be avoided.

The Compliance Manager must be told, as soon as possible, if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Concerns about any issue or suspicion of modern slavery in any part of Hive 360 business or supply chains should be raised with the Compliance Manager at the earliest possible stage however Hive 360 fully understands that not all people will feel comfortable with making the approach to them and therefore Hive 360 would encourage reporting of any concerns or information to be provided to the Modern Slavery Helpline (08000121700) where confidential advice and support is available.

Breaches or suspicion of breaches of this policy must be notified to a supervisor/manager or a report made in accordance with Hive 360 Whistleblowing Policy as soon as possible.

Hive 360 aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Any such treatment, will not be tolerated and incidents should be reported to the Managing Director immediately.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk the business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for Hive 360.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

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BREACHES OF THIS POLICY

Any employee, unless identified as a victim of modern slavery, who breaches this policy will face disciplinary action that may result in dismissal for misconduct or gross misconduct.

Hive 360 will consider terminating our relationship with other individuals and organisations working on our behalf if they breach this policy.

REVIEW

During an unprecedented 12 months we have worked to ensure that standards have been maintained, whilst planning for the next year. No incidents of Modern Slavery have been found within the supply chain and we are pressing ahead with regular annual audits of all suppliers/partners by an independent accredited lead auditor. These audits will help to highlight any areas of concern (if applicable) and will be used as an educational tool for both internal and external staff in the fight against modern slavery.

Following its initial adoption, this Modern Slavery Policy will be reviewed by the Company Director on a regular basis (at least annually) and may be amended from time to time.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Hive 360 Modern Slavery Statement for the financial year 2021.

Signed: 
David McCormack (Feb 19, 2021 13:02 GMT+2)

David McCormack, Director

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