



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Structure, business and supply chain

HA Marks Ltd is a family run small to medium sized construction company operating in greater London in nationally.

We believe transparency is the best way we can ensure the public that we are doing our best as an ethical corporate citizen. This statement is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of HA Marks and our suppliers. Our efforts against slavery and human trafficking complement our broader Modern Slavery Policy.

HA Marks Ltd is headquartered in London, UK and operates its projects throughout the United Kingdom. We have over 70 employees within our organisation in addition to those who are engaged through our supply chain. Where possible, we engage suppliers who have had long standing relationships with so that we can contain our supplier network and improve consistency in ethical practices throughout the supply chain. For a more detailed breakdown of our supply chain composition, please see the Supply Chain section of our Annual Report.

Building on our existing Modern Slavery Policy and our commitment, we have embraced the requirement to publish an annual modern slavery and human trafficking statement. This will allow us to share our efforts against slavery and human trafficking and improve and measure our success each financial year. This past financial year ending 31 March 2020, we took the following key steps to ensure slavery and human trafficking did not occur within our organisation or supply chain.

2. Slavery and human trafficking policies

Notably, we developed our Modern Slavery Policy, which can be found on our website within our Policies and Procedures. It sets out clear objectives for slavery and human trafficking plans around the following themes:

- Communication: Awareness of our policy and training on this policy to our workers and supply chain
- Feedback: Establishing grievance mechanisms and channels for individual worker feedback
- Knowledge: Improving our knowledge base by collecting relevant data and improving product traceability
- Measurable change: Developing verifiable KPIs to measure progress
- Supplier collaboration: Encouraging suppliers to collaborate to address slavery and human trafficking issues

- Incentivisation: Developing mechanisms to incentivise employees and suppliers to address slavery and human trafficking and improve labour standards
- Accountability: Establishing a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking

3. Due diligence procedures

We understand that our biggest exposure to Modern Slavery is in our product supply chains, where we have undertaken activity over the last decade to minimise the risk of Modern Slavery. Within these areas, new suppliers and factories/sites are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and factories/sites. If issues are identified, appropriate investigative and remedial actions will be taken.

4. Identifying, assessing and managing risk

We set out to identify the extent of any slavery and human trafficking in our supply chains by:

- Instituting an annual review questionnaire for existing suppliers to understand suppliers' self-assessment of slavery and human trafficking issues, allowing us to better identify slavery and human trafficking issues as they develop over time and to collect supplier-provided data to track improvement in suppliers' attitudes.

5. Key performance indicators

To assess the effectiveness of our modern slavery measures we will be reviewing the following key performance indicators:

- Staff training levels
- Number of slavery incidents reported in the supply chain.

6. Training available to staff

A key part of our slavery and human trafficking strategy is to promote cultural change through training. This last financial year we:

- Delivered online training modules on modern slavery procurement staff
- Updated our Slavery Policy
- Implemented Modern Slavery Act Statement

Date: May 2020

Review Date: May 2021

Name Adrian Crowe MCIQB

Position: Director

