

### **Slavery and Human Trafficking Statement**

Document No: HFG0664 Document Issue: V1.00

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# $1. \, {\rm Foreword} \\$

## *I.* Disclaimer / Copyright

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## *II.* Company Address / Contact

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III. Version Control

Version	Updated By	Summary of Changes	Date
V0.01	Claire Andrew	Document draft	21.12.21
V1.00	Claire Andrew	Document issued	21.04.22

## IV. Approval

This document is electronically approved and formally issued or re-issued with the approval and with the authorisation shown below. Released documents are issued in the appropriate format and do not contain a 'DRAFT' watermark.

Title	Name	Signature	Date
CEO	Scott Cassell	S. Cassell	21.04.22

### V. Terms and Definitions

Term Definition

HFG	Handsfree Group Limited		

#### 2. Slavery and Human Trafficking Statement

Handsfree Group UK specialises in the supply and installation of in-vehicle technology hardware and software. We are a total solutions provider and market leader in the field of vehicle safety and security. In accordance with s.54 of the Modern Slavery Act 2015, this statement sets out the steps Handsfree Group UK has taken during the 2021-2022 financial year, to try and ensure that slavery and human trafficking is not taking place in any of our supply chain, and any part of our business.

Handsfree Group UK recognises the importance of the Modern Slavery Act 2015 in protecting the liberty of all people. The Board of Handsfree Group UK are committed to acting ethically and with integrity in all our business relationships, and in taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.

#### Handsfree Group UK organisational structure and supply chain

Handsfree Group UK employees approximately 85 people throughout the UK. We also engage with a range of other service providers and equipment suppliers/partners to deliver our projects. The supply chain for our core activities consists of established suppliers/partners within the telematics industry.

#### Suppliers/Partners

Our suppliers/partners are predominantly UK and Europe based, and we do not consider our industry and supply chain to be particularly susceptible to modern slavery and human trafficking. Our partners within the supply chain are predominantly providing highly technical products and/or services where we consider the risk of modern slavery practices, such as forced labour or exploitation, to be low. Nevertheless, we are vigilant.

#### Standards

Key to the success of Handsfree Group UK is the development of strong partnerships with strategic suppliers/partners, and that means we look for suppliers/partners who are able to work within established service levels, provide quality deliverables and assist us in meeting and exceeding the expectations of our customers. We work closely with our suppliers/partners to ensure they share Handsfree Group UK's values and understand the importance of conducting business with honesty and integrity. We expect all of our suppliers and business partners to conduct their business in a lawful and ethical manner. This includes adopting business practices that prevent or eliminate modern slavery and human trafficking from taking place within their supply chains.

#### Supply chain management and due diligence

We carry out modern slavery due diligence on our suppliers/partners, depending on their risk profile. If, as part of this process, we were to identify a prospective supplier as being at risk of not achieving our standards (including in relation to compliance with the Modern Slavery Act 2015) then we would work with them to remedy any issues. If we cannot find a resolution with them then we will not engage with that company.

#### Whistleblowing

We operate a whistleblowing policy under which employees can report wrongdoing within the workplace. Employees should first report issues to their line manager and then to the HR Director. We encourage employees to report any instances of unethical practices by notifying the relevant person if they suspect or become aware of any modern slavery practices occurring within our business and/or supply chain.

#### Actions

In order to maintain awareness of the risk of modern slavery and human trafficking entering our supply chain or our business, and to assist in managing such risks on an ongoing basis, over the coming year we commit to do the following:

- Internal Communications We will continue to issue communications to all Handsfree Group UK colleagues informing them of the continued need to adhere to the Modern Slavery Act 2015. Communication raises awareness of the issue and we hope will encourage further innovation and engagement in relation to our approach to combating modern slavery.
- Training Colleagues will receive awareness training to ensure they understand our position on modern slavery and that they are vigilant to ensure it is prevented from happening in our business.
- Supplier Strategy We will continue to review our supplier onboarding procedures and strategies to do what we can to ensure modern slavery or human trafficking is not taking place or being facilitated by our supply chain or business.

The Company uses the following key performance indicators

- Use of labour monitoring, right to work documentation and payroll audits
- Engaging only with agencies that do not charge workers
- Using identification checks with all new hires to ensure we remain complaint with all child labour laws
- Adherence to all local and national laws to which our employees have access to a register of

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement.

Signature CAndrew

Date 19/04/2022

Name Claire Andrew

**Position HR Director**