



Policy 16

Modern Slavery

In accordance with the Modern Slavery Act 2015, Hart Miller Design/MARK Product is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively “human trafficking and slavery”). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices. Accordingly, Hart Miller Design/MARK Product will not knowingly use unlawful child labour or forced labour in any of the utilities and/or other commodities, products and/or services it provides, nor will it accept commodities, products and/or services from suppliers that employ or utilize child labour or forced labour.

1. Rationale

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This policy statement thus defines Hart Miller Design/MARK Product’s commitment to ensuring that human trafficking and slavery does not exist within its own business, but also provides how Hart Miller Design/MARK Product will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship (and especially from within its supply chain).

Hart Miller Design/MARK Product’s directors are appointed as compliance officers (our Anti- Slavery and Human Trafficking Officers) and will take appropriate steps to ensure not only the company’s own compliance but also that these requirements are followed by our suppliers, subcontractors and/or business partners (collectively by our “Suppliers”) worldwide. All Suppliers are therefore required to adhere to the following:

2. Definitions

Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child’s education, or to be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

3. Requirements from Suppliers:

Hart Miller Design/MARK Product:

Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;

Will ensure that the overall terms of employment are voluntary;

Will comply with the minimum age requirements prescribed by applicable laws

Will compensate its workers with wages and benefits in line with our fair pay policy incorporating the Real Living Wage.

Will abide by applicable law concerning the maximum hours of daily labour;

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Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK;

Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to Hart Miller Design, also adhere to these requirements.

Policy approved 29 November 2021

A handwritten signature in black ink, appearing to read 'Anna Hart'.

Anna Hart

A handwritten signature in black ink, appearing to read 'John Miller'.

John Miller

Next review date November 2022