

Anti-Slavery and Human Trafficking Policy

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1. Policy Statement

- 1.1 Speedy Hire has a zero-tolerance approach to modern slavery and it commits to acting ethically and with integrity in all of its business dealings and relationships to ensure modern slavery is not taking place in its business or in any of its supply chains.
- 1.2 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.
- 1.3 Speedy Hire commits to transparency in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. Speedy Hire expects the same high standards from all of its contractors, suppliers and other business partners.
- 1.4 Speedy Hire's mission is to provide safe reliable products and services to enable successful delivery of customer projects underpinned by its People First vision; to inspire and innovate the future of hire, and to accelerate sustainable growth. Speedy Hire's values are Ambitious, Innovative, Inclusive, Safe, Together and Trusted. Speedy Hire wants to ensure that every part of its business and all its people understand their responsibility to respect human rights and what they can do to support this initiative.
- 1.5 To this end, Speedy Hire is committed to supporting and upholding respect for the human rights enshrined in the UN Universal Declaration of Human Rights and ILO Fundamental Conventions as set out in the Declaration on Fundamental Principles and Rights at Work. Our commitments are informed by the principles of the UN Guiding Principles on Business and Human Rights (UNGPs) and OECD Due Diligence Guidance for Responsible Business Conduct (OECD Guidelines).
- 1.6 As a signatory to the UN Global Compact (UNGC), Speedy Hire is dedicated to aligning its sustainability efforts with the UN Sustainable Development Goals (SDGs). By actively participating in the UNGC's initiatives, Speedy Hire commits to making the corporate world more sustainable.
- 1.7 Speedy Hire respects the dignity of all persons and seeks to enable all colleagues to work at their best by accepting and valuing different talents, experiences, and backgrounds of all colleagues.

2. Scope

- 2.1 This policy applies to all people working in the Speedy Hire group, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, apprentices and individual temporary or fixed-term contractors ("**colleagues**"). Speedy Hire group means Speedy Hire PLC and any of its subsidiaries including Speedy Asset Services Ltd and those trading as Lloyds British.
- 2.2 Speedy Hire expects any parties who it does business with to conduct business in ways that reflect the principles of this policy. This includes all suppliers, consultants and third party representatives. Speedy Hire continues to develop its supply chain due diligence processes to evaluate suppliers against the standards of this policy, including by developing its onboarding portal; introducing supplier onboarding audits through use of a leading independent sustainable procurement onboarding platform; and internal supplier audits.

3. What is modern slavery?

- 3.1 Slavery. The behaviour which deprives the victim of his or her freedom as though the offender owns the person.
- 3.2 Servitude. The obligation to provide services that is imposed by the use of coercion.
- 3.3 Forced or compulsory labour. Service which is exacted from a person under the menace of any penalty, where the person has not offered themselves voluntarily and involves coercion, which may be direct threats of violence or more subtle forms of compulsion.
- 3.4 Human trafficking. The offence of human trafficking arises when a person arranges or facilitates the travel of another person with a view to that person being exploited even where the victim consents to the travel.
- 3.5 Red Flags. The following are a few examples of circumstances that may indicate modern slavery, a more detailed list of examples can be found [here](#):
- Child (under 16 years of age) labour being used.
 - Any form of forced or compulsory labour. Workers must be free to leave employment or work after reasonable notice.
 - Passports being taken from workers (other than for visa requirements).
 - All forms of debt bondage. Workers should not be subject to contracts that tie them into repaying a loan, accommodation or some other costs that they have little opportunity to repay.
 - Compensation and benefits that do not comply with applicable laws relating to minimum wages, overtime hours and legally mandated benefits.
 - The formation of trade unions and powers of collective bargaining not being respected.
 - Unsafe and unhealthy working conditions that do not meet applicable standards for occupational safety and health.

4. Responsibility for the policy

- 4.1 The Executive Board has overall responsibility for ensuring this policy complies with Speedy Hire's legal and ethical obligations, and that those under its control comply with it.
- 4.2 The ESG Director (as the relevant Executive Team sponsor) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. The ESG Director is supported by the governance structure incorporating the PLC Board delegated Sustainability Committee, ESG Committee and Sustainability groups throughout Speedy Hire.
- 4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and attend any required training on it.

5. Compliance with the policy

- 5.1 You must ensure that you read, understand and comply with this policy.
- 5.2 The prevention, detection and reporting of modern slavery in any part of Speedy Hire's business or supply chains is the responsibility of all those working for Speedy Hire or under its control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.3 If you believe or suspect a breach of this policy has occurred or that it may occur in the future, there are two primary channels to raise concerns:
 - 5.3.1 If instances where a conflict arises between the customs and practices that will impact on the rights that are set out in this policy, or if there are questions about this policy or to report a potential violation of this policy, those questions and concerns should be raised through existing processes; whistleblowing or resolving issues at work (grievance), where every effort will be made to maintain confidentiality.
 - 5.3.2 Colleagues can ask questions or report potential violations to local management, the Company Secretary or report it in accordance with our [Speak Up Whistleblowing Policy](#) as soon as possible. No reprisal or retaliatory action will be taken against any colleague for raising concerns, in line with the terms set out in the Whistleblowing Policy.
- 5.4 Speedy Hire aims to encourage openness and, consistent with its [Speak Up Whistleblowing Policy](#), will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken.

6. Communication and awareness of this policy

- 6.1 Communication of this policy and the risk the business faces from modern slavery, including in its supply chains, forms part of the induction process for all employees. Annual training is provided to all staff.
- 6.2 Speedy Hire's zero-tolerance approach to modern slavery is communicated to its suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.

7. Breaches of this policy

- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.2 Speedy Hire may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.
- 7.3 Where modern slavery has been identified, Speedy Hire will work with all parties involved to seek access to remedy for the victim to end or minimize the risks or violations.

8. Reviewing Effectiveness

- 8.1 This Policy was developed in conjunction with external and internal stakeholders. Going forward, Speedy Hire is committed to incorporating the views of stakeholders into reviewing the appropriateness and effectiveness of this policy.



8.2 The policy will be reviewed annually.



Issue Control Sheet

Issue Record Sheet		
Please refer to document authors for full version history and amendments		

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