

HYVE'S ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT (Reviewed 2021)

1. OUR ORGANISATION

Hyve is a leading, fully managed hosting provider. We offer tailor-made support and management hosting solutions, including mission-critical private and managed cloud, dedicated servers, security, and colocation services, to a wide range of organisations nationally, Internationally, and within the UK's public sector. Hyve's mission is to empower businesses to innovate and grow, with secure, reliable and 'always on' infrastructure.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

2. POLICY STATEMENT

- 2.1 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 in order to exploit them for personal or commercial gain.
- 2.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 2.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.
- 2.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. RESPONSIBILITY FOR THE POLICY

- 3.1 Hyve's directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 Hyve's HR manager has 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.
- 3.3 Management 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 it and the issue of modern slavery in supply chains.
- 3.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to Hyve's HR manager.

4. DUE DILLIGENCE

4.1 Recruitment

Hyve ensures that during our recruitment process all employees:

- (i) are legally permitted to work within the UK;
- (ii) undergo a DBS check prior to beginning work;
- (iii) receive a written contract of employment; and
- (iv) are provided with adequate information regarding their statutory rights including, but not limited to, sick pay, holiday pay, and any other benefits they may be entitled to.

4.2 Supply Chain

Hyve carries out reasonable due diligence when assessing potential suppliers, including:

- (i) Supplier mapping in order to identify key vulnerabilities;
- (ii) Risk assessments of spend areas and identification of any historic exposure; and
- (iii) Training and knowledge distribution for key procurement.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

5.1 Training on this policy and on the risk Hyve faces from modern slavery in its supply chains forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

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

6. MONITORING

Hyve shall review this Anti-Slavery and Human Trafficking policy at least annually.

