

## **HYVE'S ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY (US)**

### **1. OUR ORGANISATION**

Hyve is a leading, fully managed hosting provider with a real passion for technology. 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. This is why we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We are further dedicated 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 involve 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; as is consistent with our disclosure obligations under the UK's Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners. 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 statement is made on behalf of Hyve Limited incorporated and registered in England and Wales with company number 04239352 and its Affiliates. Hyve Affiliates include Hyve Managed Hosting GmbH incorporated and registered in Germany with company number HRB 266669, and Hyve Managed Hosting Corp Inc incorporated in Delaware with EIN (Employer Identification Number) 36-4869486.
- 2.4. 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.
- 2.5. This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **3. ADDITIONAL POLICIES**

- 3.1. As part of our commitment to combatting modern slavery, we have implemented the following policies:
  - (i) Anti-Corruption and Bribery Policy;
  - (ii) Equal Opportunities Policy;
  - (iii) Health and Safety Policy;

- (iv) Stress and Mental Wellbeing at Work Policy;
- (v) Grievance Policy; and
- (vi) Whistleblowing Policy.

3.2. We also make sure our suppliers are aware of our policies, and adhere to the same high standards.

#### 4. RESPONSIBILITY FOR THE POLICY

- 4.1. Hyve's board of directors has the overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2. Hyve's Legal Executive and Compliance Officer have primary, and day-to-day, responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 4.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy, are given adequate and regular training on it, and the issue of modern slavery in supply chains.
- 4.4. 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 Legal Executive or Compliance Officer.

#### 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 our business or supply chains is the responsibility of all those working for us, or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.3. You must notify your department manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 5.4. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 5.5. If you believe or suspect a breach of this policy has occurred, or that it may occur, you must notify your department manager as soon as possible.
- 5.6. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.
- 5.7. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be taking place, in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action,

threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform Hyve's HR manager immediately.

## 6. DUE DILLIGENCE

### 6.1. Recruitment

Hyve ensures that during our recruitment process all employees:

- (i) are legally permitted to work within the UK or the locations of our Affiliates;
- (ii) undergo a DBS, or equivalent, 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.

### 6.2. Supply Chain

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

- (i) ensuring use of suppliers who have their own codes of conduct in place;
- (ii) mapping suppliers in order to identify key vulnerabilities;
- (iii) conducting risk assessments of spend areas and identification of any historic exposure;
- (iv) training and knowledge distribution for key procurement;
- (v) reviewing of our policies and code of conduct regularly; and
- (vi) protecting whistle-blowers.

## 7. COMMUNICATION AND AWARENESS OF THIS POLICY

7.1. 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.

7.2. 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.

## 8. BREACHES OF THIS POLICY

8.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

8.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 9. MONITORING

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

## 10. CONTACT DETAILS

The Legal Executive can be contacted directly at: [legal@hyve.com](mailto:legal@hyve.com)

The Compliance Officer can be contacted directly at: [compliance@hyve.com](mailto:compliance@hyve.com)

The HR Manager can be contacted directly at: [hr@hyve.com](mailto:hr@hyve.com).

## 11. DOCUMENT HISTORY

Revision Date	Version No.	Amendment	Authorised by:	New Version No.
1 <sup>st</sup> January 2022	1.1	Created by Jamie Todd	Laura Prees	1.2
31 <sup>st</sup> August 2023	1.2	Updated by Kaliah Barker	Jamie Todd	1.3