

MODERN SLAVERY POLICY

Hutton Construction Ltd maintains relationships with many different organisations in its supply chain, as well as employing directly large numbers of people. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chain.

HUTTON CONSTRUCTION LTD MODERN SLAVERY VALUE

As part of our culture of good governance for good business, at Hutton Construction Ltd we operate a set of core values which reflect our relationships with our principal stakeholder groups: customers, manufacturers, shareholders, suppliers and team members. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

OUR ATTITUDE TO MODERN SLAVERY IS – ZERO TOLERANCE

1. The purpose of this policy

- 1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of Hutton Construction Ltd (the “Company”) with the aim of the prevention of opportunities for modern slavery to occur within its business or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.
- 1.2 As a group 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 and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.
- 1.3 All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members’ obligations under their contract of employment.

2. Steps for the prevention of modern slavery

2.1 We are 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 of our contractors, suppliers and other business partners and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

2.2 The Company currently operates in the following Countries:

- United Kingdom

2.3 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To reinforce our compliance with practical steps, we intend to implement the following measure:

- i) conduct risk assessments, where appropriate, to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- ii) engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- iii) where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- iv) provide regular training to Team Leaders at all levels within the business to ensure staff who report to them understand and comply with this policy

3. Responsibility for the Policy

3.1 Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The board of directors has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

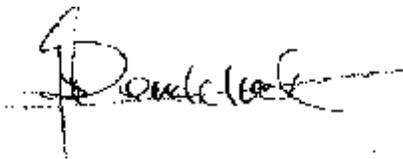
4. Safeguards

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. The company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Signed

A handwritten signature in black ink, appearing to read 'John Bendelack', written over a horizontal line.

John Bendelack
Managing Director
December 2016