

Modern Slavery Act Policy Statement

Purpose

The purpose of this document is to outline how HCP is complying with the Modern Slavery Act 2015. This Act sets out a range of measures on how businesses should respond to requirements particularly Section 54 concerning supply chains.

Scope

This Statement outlines the steps HCP is taking to ensure compliance with the statutory requirements.

Modern slavery is the term used to encompass slavery, forced and compulsory labour and human trafficking.

Responsibilities

- HCP is required to publish a “Slavery and Human Trafficking” statement for each Financial Year. This will be approved by Management Board and signed by the CEO annually.
- All HCP employees should be alert to the risks brought about by modern slavery which could affect our business and our supply chain. Staff should report any concerns to HCP management who will take the appropriate action.

Statement

1 Organisation

- 1.1 HCP is responsible for providing Project Management Services to Infrastructure Investors. Each Project’s Management Team consists of HCP personnel who oversee the day to day running and management of the contract on behalf of Project Companies, with the majority of activities directly contracted out to third party suppliers by the Project Companies.
- 1.2 Where HCP provides management services to Project Companies, it will assist them to tackle the threat of human trafficking and modern slavery. Where HCP directly employs suppliers, it will seek to work in partnership with these suppliers to tackle the threat of human trafficking and modern slavery across our business operations and throughout our supply chain, in accordance with international environmental, social and ethical standards.

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2 Our Supply Chains

HCP's supply chains are transparent and limited. We use reputable and internationally recognised companies for the provision of services and maintenance of our projects, all of which have been assessed and approved as suitable business partners. We do not act as a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities.

3. Due diligence and implementation processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures, which form part of HCP's business management system, HBMS.

4 Communication

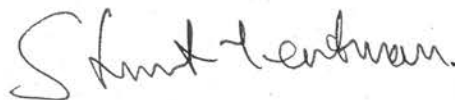
We will communicate this statement to our stakeholders to ensure a high level of understanding of the risks of modern slavery and human trafficking which could affect our business.

5 Legal and regulatory purpose of this statement

This statement is made to align with the obligations arising under section 54(1) of the UK Modern Slavery Act 2015 (the Act). This statement should be considered to constitute the slavery and human trafficking statement for HCP for the current financial year and all future financial years until it may in future be modified or amended.

This Statement will be reviewed annually as required by the Act.

Signed:



Print: Stuart Yeatman
 Position: Chief Executive Officer
 Date: 1/03/2020

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