



Anti-slavery and human trafficking statement.

1: Opening statement from senior management

HATS is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers.

Modern slavery is a crime and a violation of fundamental human rights. We at HATS recognise the various forms that it takes, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common a person's deprivation of liberty.

We have a zero-tolerance approach and 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.

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 they are required to adhere to our Modern Slavery Policy. The Policy applies to all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

As CEO, myself and the Board have overall responsibility for ensuring that HATS comply with our legal and ethical obligations, and that all those under our control comply with it.

2: Structure of the organisation

HATS is an industry leading provider of transport services, delivering high quality patient transport to the NHS and CCG's, as well as private medical institutions. HATS also provide Home to School Transport for children with special educational needs and disabilities and are a trusted chosen provider for 31 out of 33 London boroughs. It employs circa. 200 people across the country and a fleet of over 800, our business operations spread across the South East, throughout London and also the North East.

HATS has a global annual turnover of £44 million. To find out more about the nature of our business, please click www.hatsgroup.com.

3: Policies

As part of our commitment to combating modern slavery, we have implemented our Modern Slavery Policy. We also operate employment policies and procedures designed to treat all individuals who work within our business with respect and strive for fair rewards.

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

4: Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we carry out due diligence to ensure all that we work with have the same commitment as us and adhere to our policies.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- proactively and routinely check and ask for evidence of 3rd-parties having conducted their own modern slavery and human trafficking activities
- conduct routine staff surveys to monitor potential risk areas
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistle-blowers

5: Risk and compliance

HATS regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by continual risk assessment. We also ensure that all contracts contain clauses and provisions adhering to the Act. We are currently developing a supplier questionnaire and supplier code of conduct to ensure that any (although minimal) suppliers comply with the Act.

We do not consider that we operate in high-risk sectors or locations because our main obligations are with NHS and CCG's and therefore, they also have stringent adherence to the Act.

The organisation takes a robust approach in recruiting both its corporate and flexible workforce. We communicate directly with all candidates to discuss any work opportunities and to confirm details of any offer made. We have rigorous procedures in place for the vetting of new employees and workers and ensure that we are able to confirm their identities, their right to work in the United Kingdom and that they are paid above the National Living Wage directly a personal bank account.

All employees and workers are required to meet with someone from the organisation in person and provide us with their original Right to Work in the United Kingdom documentation for certification and verification. For any employee or worker with a work permit or visa, we carry out regular audits and management of these documents to ensure they remain valid. All new corporate starters are required to complete an induction which includes information and training on the company policies.

When using employment agencies, we only use specific reputable companies to source workers and always verify their practices in the first instance.

We ensure all our suppliers adhere to our Modern Slavery Act. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains.

6: Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

7: Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- To introduce a further overview of our Modern Slavery Policy and the Act in our induction to all new employees;
- To deliver further targeted training to our procurement staff
- To implement supplier questionnaire and supplier code of conduct
- To appoint a person to review and control supplier adherence and to introduce KPI's.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes HATS's slavery and human trafficking statement for the financial year ending 31 August 2021.

This statement was approved by the Board.

Signature:

A handwritten signature in black ink, appearing to read 'Henry Bilinski', written in a cursive style.

Henry Bilinski

Chief Executive Officer

HATS

Date: 27th May 2021