

**Modern slavery, human trafficking and all related activities that involve the deprivation of a person's liberty in order to exploit them for personal or commercial gain are crimes and constitute a violation of fundamental human rights. HE Simm is committed to acting ethically and with integrity to ensure there is no modern slavery, human trafficking or related activities taking place anywhere within its business or supply chain. This statement represents the policy of HE Simm regarding modern slavery and human trafficking, in line with the disclosure requirements of the Modern Slavery Act 2015.**

HE Simm supplies complete building services packages, specialising in the design, build and maintenance of highly efficient mechanical, electrical and public health systems. Our integrated supply chain is a strategic business asset crucial to our success. We strive to develop exceptional relationships with consistently high-performing supply chain partners who share our vision and values.

We acknowledge that the structure and success of the business is reliant on the use of competent labour, either employed directly, through our subcontract supply chain or our goods and materials supply chain. In this respect, we understand that there is risk that modern slavery may take place. As a part of our commitment to identify and mitigate these risks, we have the following arrangements in place:

- | employment eligibility checks on all directly employed personnel
- | our Supply Chain Charter, which aims to create a consolidated supply chain and ensures we only work with subcontractors and suppliers who aspire to the same standards
- | completion of robust due diligence checks on all subcontractors and suppliers, including completion and assessment of pre-qualification questionnaires, submission of a formal declaration of workforce eligibility and completion of verification audits
- | ongoing checks on the eligibility of all site-based workforce
- | supporting policies, including 'Anti-bribery and Corruption' and 'Whistleblowing'.

HE Simm will communicate this policy to all stakeholders via appropriate means. All supply chain providers will be expected to acknowledge this policy and provide evidence, as necessary, to verify they operate to the same standards.

As part of the communication of this policy, all stakeholders will be encouraged to report any genuine

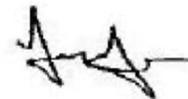
concerns about any activities which may be connected to modern slavery or human trafficking. All reports will be handled in absolute confidence and those raising any genuine concerns will be fully supported, in line with the principles of this policy and our Whistleblowing Policy. No-one will be subject to any repercussions or detrimental treatment, even if their concerns prove to be mistaken.

HE Simm will provide additional resource and training where necessary to ensure those with direct responsibilities for fulfilling the arrangements within this policy have the appropriate competence to do so.

This policy and the associated arrangements are valid for the current financial year and will be subject to formal review periodically to ensure their continued effectiveness and suitability.



GARETH SIMM  
Chief Executive Officer  
(CEO)



ANTHONY MELIA  
HESQ Director

18 DECEMBER 2020  
(expires 31 JULY 2021)