



Social Responsibility Policy

Policy Statement

This policy applies to all persons working for us or on behalf in any capacity, including employees at all levels, directors, volunteers, agents and contractors.

HACW Ltd strictly prohibits the use of modern slavery and human trafficking in our operation. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation.

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern Slavery is a crime and a violation of fundamental human rights.

Commitments

We shall be a company that expects everyone working with us or on behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero tolerance approach to modern slavery in our organisation and franchises.
- The prevention, detection and reporting of modern slavery in any part of our organisation is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders to address the risk of modern slavery in our operations.

Consistent with our risk-based approach we may require:

- All franchisees and recruitment agencies to our organisation to confirm their compliance with our code of conduct
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us to carry out audits of franchisees for their compliance with our code of conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibilities of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.