

Modern Slavery and Human Trafficking Statement

Introduction

Horizon Parking Ltd, led by a Board of Directors, works across both the public and private sector, providing individually tailored car park management solutions nationwide. As a business we are committed to acquiring goods and services for our customers without causing harm to others. In so doing, we are committed to supporting the UK Government's Action Plan to implement the UN Guiding Principles on Business and Human Rights.

This Statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by informing our employees, suppliers, other third-party partners, and customers about our Company and our Statement with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

Although, as a business, we turnover less than the threshold for businesses required to publish a statement under the Act, our Board considers that our customers spend through its supply agreements warrants a statement on the risks inherent in our supply chains and the steps we are taking to address them, in line with our practices in sustainable and responsible procurement.

The information included within this statement refers to our financial 2022 / 2023.

Organisation Structure

Horizon Parking Ltd is controlled by its Board of Directors including our Chief Executive Officer, Financial Director, HR Director, Sales & Business Support Director, Operations and Facilities Maintenance Director and Commercial Director.

As a nationwide organisation you can find our employees working from either our Head Office based in Chelmsford Essex, one of our satellite offices based in Long Eaton, Liverpool, and Wigan, or from home providing services across their given area.

Definitions

Our organisation considers that Modern Slavery and Human Trafficking encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Being dehumanised, treated as a commodity, or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment

We acknowledge our responsibilities in relation to tackling modern slavery and commit to complying with the provisions within the Modern Slavery Act 2015. We understand that this requires ongoing reviews of both our internal practices in relation to our labour workforce, and additionally it's supply chain.

We do not enter into business with any other organisation, whether within the United Kingdom or further afield, that knowingly supports or are found to involve itself in slavery, servitude and forced or compulsory labour.

We strictly adhere to the minimum standards required in relation to our responsibilities under relevant employment legislation within the United Kingdom, and in many cases exceed those minimums in relation to our employees.



We will provide a trusted service for our customers that exceeds their expectations...

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Our Categories

Our supply chain mainly falls under 4 categories, which are:

- Labour.
- Sub- Contractors / Agency Staff.
- Suppliers of equipment and services.
- Supplier of parts.

Horizon Parking Ltd is committed to ensuring that:

- Employment is freely chosen;
- Freedom of association and the right to collective bargaining are respected;
- Working conditions are safe and hygienic;
- Child labour shall not be used;
- Living wages are paid;
- Working hours are not excessive;
- No discrimination is practised;
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

In general, we consider our exposure to slavery and / or human trafficking to be relatively limited. Nonetheless, we have taken steps to ensure that such practices do not take place within our business nor the business of any organisation that supplies goods and / or services to us.

Steps Taken

We carry out due diligence processes in relation to ensuring slavery and / or human trafficking does not take place in our company or its supply chains, including conducting reviews of the controls of our suppliers.

We have not, to our knowledge, conducted any business with another organisation which has been found to have been involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, we have taken the following steps to ensure that modern slavery is not taking place and / or our employees understand the importance of compliance with our stance on this matter:

- reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- assessed the potential risks within our supply chain.
- undertaking assessments of our services upon potential instances of slavery.
- conducted Modern Slavery Training with our employee's via our e learning portal.

As part of this reporting exercise in this and the coming years, we express our commitment to the abolition of modern slavery, human trafficking, forced and bonded labour and labour rights violations.

Policies

We have the following policies which further define our stand on Modern Slavery – Corporate Social Responsibility Policy, Supplier Code of Conduct Policy, Recruitment Policy, Whistleblowing Policy, Fair Pay Policy, Living Wage Policy, Anti-Bribery and Anti-Corruption Policy.

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Responsibility for The Policy Statement

This policy statement has been approved and published by our Board and will be reviewed at least annually.

The Board of directors have overall responsibility for ensuring that this statement complies with the Company's legal and ethical obligations.

The HR Director has day-to-day responsibility for implementing this statement, monitoring its use and effectiveness, and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this statement.

Compliance

The prevention, detection, and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under the Company's control. All employees are required to avoid any activity that might lead to a breach of this statement.

If any employee believes or suspects a breach of, or conflict with, this statement has occurred or may occur, they must notify the HR Director or report it in accordance with the Company's Disclosures in the Public Interest (Whistle Blowing) Policy. All employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If an employee is unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, they must raise it with their line manager. Employees can also contact the government's Modern Slavery Helpline on 08000 121 700 for further information and guidance on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this statement, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Training and Communication

Regular training on this statement, and on the risk that the business faces from modern slavery in its supply chains, will be provided to Managers as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Breach of this Statement

Any employee who breaches this statement will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors, and other business partners if they breach this statement and/or are found to have been involved in modern slavery.