

HUGHES ELECTRICAL LTD AND SUBSIDIARY GROUP COMPANIES

MODERN SLAVERY ANNUAL STATEMENT FOR PERIOD 1ST APRIL 2020 - 31ST MARCH 2021

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes Hughes Electrical Limited’s annual modern slavery statement. The company is committed to conducting all aspects of its business in an ethical and transparent manner. We acknowledge our duties and responsibilities under the Act. Forced or compulsory labour, human trafficking and other kinds of slavery represent some of the gravest forms of human rights abuse in any society. We all have a responsibility to be alert to the risks in both within our business and our supply chain.

Our business values require that all workers are treated with dignity and respect. We are fundamentally opposed to slavery, human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace.

This statement is made by Hughes Electrical Limited on its own behalf and on behalf of all its subsidiary companies within the group.

Subsidiary companies of Hughes Electrical Limited that are incorporated in the UK and also subject to the reporting requirements under s.54 of the Act are:

- Hughes TV & Audio
- Hughes Rental
- WASHCO Limited

Our statement sets out the steps that Hughes Electrical Limited and its subsidiary companies have either already taken during the financial year to 31st March 2021, and details of what the business intends to take during the next 12 month period, to prevent modern slavery and human trafficking in the business and supply chains.

STRUCTURE AND SUPPLY CHAINS

We are an electrical retail company who both sells and rents household appliances and other consumer electronics to customers in either domestic or commercial settings within the UK. We deliver products via our in-house logistics division and carefully selected third parties. We also provide ancillary services such as the installation of new and collection of old products and offer product protection plans and customer finance.

Our supply chain network covers the products we sell and rent to customers, the transportation and delivery of such products and our day-to-day operations.

The electrical appliances we sell or rent are generally purchased from local supplier subsidiaries within the UK which are part of larger global organisations. These relationships are managed by our dedicated procurement teams. Supply chains are often complex in terms of structure with a significant number of layers. Our anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships, helping to ensure that slavery and human trafficking is not taking place anywhere in our business. We expect all those in our supply chain to comply with this approach.

EMPLOYMENT & RECRUITMENT

We are committed to providing a great place to work for our employees and this is at the heart of our business strategy.

We comply with local minimum age and wage laws and do not employ child labour. We regularly perform age v’s hourly payrate checks to ensure compliance.

All our employees (i.e. those who are paid directly via Hughes Electrical Limited) are:

- paid by bank transfer; we do not allow payment to be made into third party bank accounts, thus minimising the risk of forced or compulsory labour. We also obtain proof of bank account details as to reduce fraud.
- All Hughes employees receive details of pay (within their payslips) when they are paid and clearly shows all deductions for tax and National Insurance contributions.
- All new employees are vetted for the right to work in the country before they are employed. Where employees require a work permit/VISA we ensure they have the necessary documentation in place.

As a responsible employer, we take the welfare of our employees (and others working on our behalf) seriously. Our whistleblowing policy encourages employees to report wrongdoing (including exploitation) in any form. We are committed to investigating all matters raised through our whistleblowing policy via robust and transparent processes. Staff are given details of a confidential telephone contact so that all employees can raise any concerns without fear of reprisals.

DUE DILIGENCE & RISK ASSESSMENT PROCESSES

Prior to entering into agreements with manufacturers (suppliers) we will perform due diligence checks to assess areas of potential risk within our supply chains with the aim of ensuring that manufacturer suppliers have their own clearly defined ethical working practices including suitable anti-slavery and human trafficking policies and processes within their businesses and confirmation that they comply with the requirements of the Modern Slavery Act 2015.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business we are developing the training available for our staff, and we encourage them to identify and report any potential concerns.

We will assess any instances of non-compliance on a case-by-case basis and tailor any remedial action appropriately.

TRAINING/AWARENESS

It is our aim to supply all employees with Modern Slavery Awareness training and going forward will aim for all new employees who join the company to receive Modern Slavery awareness training as part of their induction within the first 2 weeks of employment.

In addition to this, relevant employees within the group (to include those working in procurement, human resources, health & safety and senior on-site roles) are required to complete a modern slavery and human trafficking e-Learning training module. This course covers the requirements of the Act, our business obligations, our supply chain expectations and the potential consequences for non-compliance.

MEASURING EFFECTIVENESS

In order to assess the effectiveness of our modern slavery measures we will be reviewing the following key performance indicators:

- Staff training levels
- Number of slavery incidents reported in the supply chain

Approved by the Hughes Electrical Limited Board of Directors on 1st April 2021

For and on behalf of Hughes Electrical Limited:



Robert Hughes - Chair

Date: 01.04.2021