Modern Slavery and Human Trafficking Statement

1. *Introduction:*

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the current financial year.

HTG Trading Limited is a UK registered company operating throughout the United Kingdom. The company provides commercial foodservice equipment sales, installation, maintenance and support services.

HTG Trading Limited is committed to preventing modern slavery and human trafficking in all its forms. This statement sets out the steps we have taken — and continue to take — to ensure that slavery and human trafficking are not present in our business or supply chains. We expect everyone working with us or on our behalf to share this commitment.

All employees have a responsibility to remain alert to potential risks, however small, and to report any concerns immediately. Managers are required to act on concerns without delay.

2. *Our Organisational and Supply Chains*

HTG Trading Limited is the umbrella organisation for Hubbard Systems, Taylor UK and HTG Service. With more than 40 years' experience in the UK foodservice equipment industry, we supply premium equipment brands and provide an extensive after-sales support service through our Customer Service and Support Centre.

We employ just under 100 people across the UK and operate solely within the United Kingdom.

Our supply chain includes manufacturers, distributors, logistics partners, and service providers. We work with established suppliers and maintain long-standing relationships to ensure consistent standards of quality, safety, and ethical practice.

As part of our compliance processes, we refer to our Right to Work in the UK Policy (reviewed annually, or where legislation changes) to ensure all workers have the legal right to work and are protected from exploitation.

3. *Identifying and Managing Risk*

At the time of preparing this statement, we have not identified any high-risk activities within our direct operations. However, we recognise that no organisation is immune to the risk of modern slavery, and we remain vigilant.

Supplier Risk-Rating Approach:

To strengthen our oversight, we are introducing a simple supplier risk-rating model based on:.

- Geographical location
- Sector-specific risk factors
- Labour-intensive processes
- Use of subcontractors or temporary labour
- Transparency of ownership and labour practices

Suppliers assessed as medium or high risk may be subject to enhanced due diligence.

We expect key suppliers to comply with all applicable employment, immigration and human rights legislation and, where appropriate, to maintain their own Modern Slavery Statement or equivalent commitment to preventing forced labour and human trafficking.

4. Roles and Responsibilities

- **HR Manager** – responsible for policy development and review.
- **Health & Safety Manager** – responsible for risk assessments relating to human rights and modern slavery.
- **Board of Directors & Senior Management Team** – responsible for due diligence, oversight, and responding to any known or suspected cases of modern slavery.

5. Training

To ensure a strong understanding of modern slavery risks, all staff are required to complete relevant training, including:

- Job-specific training
- Online learning modules
- Refresher training where required

Training helps employees recognise warning signs and understand how to report concerns safely.

6. Policies Supporting Our Commitment

HTG Trading Limited has a number of policies that support our approach to preventing modern slavery:

- **Whistleblowing policy -** encourages staff, customers, and partners to report concerns confidentially.
- **Code of Conduct -** sets out expected standards of behaviour.
- **Corporate Social Responsibility (CSR) Policy -** Outlines our commitment to responsible business practices.
- **Environmental, Social, and Governance (ESG) Policy** - sets standards for ethical and sustainable operations.

Zero-Tolerance Statement

HTG Trading Limited has a **zero-tolerance approach** to modern slavery and human trafficking. We expect the same high standards from all suppliers, contractors, and business partners.

7. Due Diligence Processes

We undertake due diligence when onboarding new suppliers and reviewing existing ones. This includes:

- Building long-standing supplier relationships
- Communicating our expectations clearly
- Assessing modern slavery risks for new suppliers
- Taking action where concerns arise, including issuing improvement plans or terminating relationships where necessary
- Review of supplier policies and ethical standards

Supplier Mapping Commitment

We are working towards greater visibility across our supply chain by mapping key suppliers and identifying where labour-related risks may be more prevalent.

8. Measuring Effectiveness

We use the following indicators to assess our effectiveness in preventing modern slavery:

- Completion rates for modern slavery training

- Supplier compliance with our due diligence requirements
- Monitoring of labour practices through payroll and HR systems
- Review of any reported concerns or incidents

9. *Reporting Concerns*

Employees, suppliers, and partners are encouraged to report concerns through our Whistleblowing Policy.

External Reporting Route

Concerns can also be raised externally via the **Modern Slavery Helpline (0800 0121 700)** if individuals prefer to report outside the organisation.

Any allegation or concern relating to modern slavery will be investigated promptly and confidentially. Where appropriate, concerns may be referred to relevant authorities, law enforcement agencies, or specialist support organisation.

10. *Review and Approval*

This statement will be reviewed annually and updated as necessary to reflect our ongoing commitment to preventing modern slavery and human trafficking.

It has been approved by the Board of Directors of HTG Trading Limited, who are fully committed to its implementation.

Name:	Simon Aspin
Position:	Chief Executive Officer – HTG Trading Ltd
Date:	1st January 2026
Signature:	