

# Anti-slavery and human trafficking statement 2020

#### 1. Opening statement

HGF is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and requires the same high standards on its suppliers. We commit to uphold the principles of the United Kingdom's Modern Slavery Act 2015, both within the firm and through its relationships with clients and associates.

#### 2. Structure of the organisation

HGF is a group of companies operating in Europe.

HGF Limited is a United Kingdom company (No. 08998652) having its registered office at 1 City Walk, LEEDS LS11 9DX. We operate out of offices in twelve UK cities. Some of HGF Limited's shareholders are members of a law firm, HGF Law LLP (OC382146) and some are members of HGF Europe LLP (OC425986), both partnerships having their registered office at the same address.

HGF Limited has three wholly-owned operating companies outside of the United Kingdom, namely HGF BV, a Dutch company (No. 63864606) having offices in The Hague and Amsterdam; HGF GmbH, a Swiss company (No. CHE-484.730.827) having an office in Basel; and HGF IP Limited, and Irish company (No. 622725) having offices in Dublin and Westport. HGF Europe LLP has offices in Munich and Heidelberg in German, and Saltzburg in Austria, as well as in the UK, and operates primarily in the German/Austrian market.

All these companies are hereafter referred to as "HGF" and this statement covers them all. HGF is an independent professional services firm within the Intellectual Property sector, providing advice to clients based around the world. Our services are primarily in advising on, obtaining, enforcing and exploiting intellectual property rights for our clients.

Most of our clients are commercial organisations, research and development based companies, and universities and other institutions, who make inventions and/or design new products, and/or have brands and trade marks that distinguish their goods and services. We work with attorneys in many different countries around the world whom we instruct to provide such services on behalf of our clients. Mostly, these attorneys are also our clients, asking us to perform services in Europe for them, on behalf of their own clients.

More information about HGF can be found on our website <u>hgf.com</u>.

HGF and its legally qualified employees are regulated by one or more of the following professional bodies and codes:

- Intellectual Property Regulation Board (IPReg) Rules of Conduct for Patent Attorneys, Trademark Attorneys and other Regulated persons
- Institute of Professional Representatives before the European Patent Office Code of Conduct and Regulation on Discipline
- Solicitors Regulatory Authority (SRA) <u>SRA Standards and Regulations</u>
- Patentanwaltskammer <u>Patent Attorney Act in Germany</u> and <u>Professional Code</u>

The majority of HGF's employees are employed directly and on a permanent basis. Recruitment takes place through direct advertising on our website, through reputable agencies and on the basis of referrals from employees within our firm. The identity and right to work in their place of business of all our employees is checked.

#### 3. Policies

As part of our commitment to combating modern slavery, HGF:

- Has a policy regarding slavery and human trafficking
- Pays staff fairly for their work and above national standards regarding minimum wage
- · Acts ethically and with integrity in all our business relationships
- Identifies, assesses and monitors potential risk areas in our supply chains to mitigate the risk of slavery and human trafficking occurring;
- Protects whistle blowers.

We also ensure our clients and associates are aware of our policies, and adhere to the same high standards, by drawing attention to this document, and our policies, in our Terms and Conditions of Business.





All these documents are available for review on our Legal Documents page on our website.

#### 4. Risk and compliance

HGF evaluates from time to time the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain. Our supply chain outside the United Kingdom in relation to our services consists, on the whole, of other regulated professional service businesses like our own. We consider these to be very low risk in relation to slavery and human trafficking issues. Accordingly, other than visiting our associates from time to time, no specific action is taken with regard to these relationships. In this year, however, visits to clients and associates has been severely curtailed by the Covid-19 pandemic.

Nevertheless, we continue to believe there is a very low risk of slavery or human trafficking having a connection with the firm's activities. We do not consider that we operate in high risk sectors or locations. Most of our clients require services to be performed in industrialised countries and we employ legal services that would not normally be considered a likely employer of slave labour, or low paid workers.

We endeavor to ensure that all our suppliers adhere to our anti-slavery Policy. If we were to find evidence of a failure to comply with our policies on this and other matters (e.g. bribery or corruption) we would immediately seek to terminate our relationship with the relevant supplier.

#### 5. COVID-19 Implications

During the Corona virus pandemic, HGF was able to continue its activities by staff working from home. Out IT department was able to provide staff with suitable home-working computer equipment at short notice and most staff remained fully occupied. Regular video-conference contact was maintained with and between staff.

Measures were implemented to ensure the ongoing viability of the business to protect jobs while the pandemic lasts.

#### 6. Training

Chief Executive Office

HGF Limited, 1 City Walk, LEEDS LS11 9DX

Because we consider our business to be at a low risk of being involved with slavery and human trafficking, we do not have a specific training programme for our staff beyond making known to them on a regular basis our policy on this and other matters. Employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. They are required to comply with our bribery and corruption policy.

#### 7. Further actions and sign-off

Following our review of our actions this financial year (ending 30 April 2020), we are satisfied that our business continues to pose little opportunity for human exploitation, either directly within HGF and through interactions with our business support suppliers, or through our interactions with clients and associate law firms.

This statement, approved by the Board of HGF, is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes HGF's slavery and human trafficking statement for the financial year commencing 1 May 2019 and ending 30 April 2020.

Signature:

Date

19/10/2020

Paul Sanderson





# Anti-slavery and human trafficking statement 2019

#### 8. Opening statement

HGF is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and requires the same high standards from its suppliers. We commit to uphold the principles of the United Kingdom's Modern Slavery Act 2015, both within the firm and through its relationships with clients and associates.

### 9. Structure of the organisation

HGF is a group of companies operating in Europe.

HGF Limited is a United Kingdom company (No. 08998652) having its registered office at 1 City Walk, LEEDS, LS11 9DX. We operate out of offices in twelve UK cities. Some of HGF Limited's shareholders are members of a law firm, HGF Law LLP (OC382146) and some are members of HGF Europe LLP (OC425986), both partnerships having their registered office at the same address.

HGF Limited has three wholly-owned operating companies outside of the United Kingdom, namely HGF BV, a Dutch company (No. 63864606) having offices in The Hague and Amsterdam; HGF GmbH, a Swiss company (No. CHE-484.730.827) having an office in Basel; and HGF IP Limited, an Irish company (No. 622725) having offices in Dublin and Westport. HGF Europe LLP has offices in Munich and Heidelberg in Germany, and Saltzburg in Austria, as well as in the UK, and operates primarily in the German/Austrian market.

All these companies are hereafter referred to as "HGF" and this statement covers them all. HGF is an independent professional services firm within the Intellectual Property sector, providing advice to clients based around the world. Our services are primarily in advising on, obtaining, enforcing and exploiting intellectual property rights for our clients.

Most of our clients are commercial organisations, research and development based companies, and universities and other institutions, who make inventions and/or design new products, and/or have brands and trade marks that distinguish their goods and services. We work with attorneys in many different countries around the world whom we instruct to provide such services on behalf of our clients. Mostly, these attorneys are also our clients, asking us to perform services for them, on behalf of their own clients.

More information about HGF can be found on our website <u>hgf.com</u>.

HGF and its legally qualified employees are regulated by one or more of the following professional bodies and codes:

- Intellectual Property Regulation Board (IPReg) Rules of Conduct for Patent Attorneys, Trade Mark Attorneys and other Regulated persons
- Institute of Professional Representatives before the European Patent Office Code of Conduct and Regulation on Discipline
- Solicitors Regulatory Authority (SRA) SRA Handbook
- Patentanswaltskammer Patent Attorney Act in Germany and Professional Code

The majority of HGF's employees are employed directly and on a permanent basis. Recruitment takes place through direct advertising on our website, through reputable agencies and on the basis of referrals from employees within our firm. The identity and right to work in their place of business of all our employees is checked.

### 10. Policies

As part of our commitment to combating modern slavery, HGF:-

- Has an active policy regarding slavery and human trafficking
- · Pays staff fairly for their work and above the national standards regarding minimum wage
- Acts ethically and with integrity in all our business relationships
- Identifies, assesses and monitors potential risk areas in our supply chains to mitigate the risk of slavery and human trafficking occurring
- Protects whistle blowers.





We also ensure our clients and associates are aware of our policies, and adhere to the same high standards, by drawing attention to this document, and our policies, in our Terms and Conditions of Business. We are taking steps to draw this statement and our policy to the attention of business support suppliers, who we expect to adhere to the principles and standards set out in them.

All these documents are available for review on our Legal Documents page on our website.

#### 11. Risk and compliance

HGF evaluates from time to time the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain. Our supply chain outside the United Kingdom in relation to our services consists, on the whole, of other regulated professional service businesses like our own. We consider these to be very low risk in relation to slavery and human trafficking issues. Accordingly, other than visiting our associates from time to time, no specific action is taken with regard to these relationships.

We believe there is a very low risk of slavery or human trafficking having a connection with the firm's activities. We do not consider that we operate in high risk sectors or locations. Most of our clients require services to be performed in industrialised countries and we employ legal services that would not normally be considered a likely employer of slave labour, or low paid workers.

We endeavor to ensure that all our suppliers adhere to our anti-slavery Policy. If we were to find evidence of a failure to comply with our policies on this and other matters (e.g. bribery or corruption) we would immediately seek to terminate our relationship with the relevant supplier.

#### 12. Training

Because we consider our business to be at a low risk of being involved with slavery and human trafficking, we do not have a specific training programme for our staff beyond making known to them on a regular basis our policy on this and other matters. Employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. They are required to comply with our bribery and corruption policy.

### 13. Further actions and sign-off

Following our review of our actions this financial year (ending 30 April 2019), we are satisfied that our business continues to pose little opportunity for human exploitation, either directly within HGF and through interactions with our business support suppliers, or through our interactions with clients and associate law firms.

This statement, approved by the Board of HGF, is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes HGF's slavery and human trafficking statement for the financial year commencing 1 May 2018 and ending 30 April 2019.

10. September 2019

Signature:

Paul Sanderson

Chief Executive Office

HGF Limited, 1 City Walk, LEEDS LS11 9DX



### Anti-slavery and human trafficking statement 2018

#### 14. Opening statement

HGF is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. We commit to uphold the principles of the United Kingdom's Modern Slavery Act 2015, both within the firm and through its relationships with clients and associates.

### 15. Structure of the organisation

HGF Limited is a United Kingdom company (No. 08998652) having its registered office at 1 City Walk, LEEDS LS11 9DX. Our shareholders are all employees of HGF Business Services Limited, a wholly owned subsidiary of HGF Limited. Some shareholders are also members of our law firm, HGF Law LLP (OC382146) having its registered office at the same address. We have offices in twelve UK cities and five European cities outside the UK.

We have two operating companies outside of the United Kingdom, namely HGF BV, a Dutch company (No. 63864606) based at Zuid-Hollandlaan 72596 AL, The Hague, The Netherlands and HGF GmbH (HGF Sarl) (HGF LLC), a Swiss company (No. CHE-484.730.827) based at OBC Suisse AG, Basel-City, Aeschenvorstadt 71CH - 4051 Basel, Switzerland.

All these companies are hereafter referred to as "HGF" and this statement covers them all. HGF is an independent professional services firm within the Intellectual Property sector, providing advice to clients based in the United Kingdom, continental Europe and around the world. Our services are primarily in obtaining, enforcing and exploiting intellectual property rights for our clients.

Most of our clients are commercial organisations, research and development based companies, and universities and other institutions, who make inventions and/or design new products, and/or have brands and trade marks that distinguish their goods and services. We work with attorneys in many different countries around the world whom we instruct to provide such services on behalf of our clients. Mostly, these attorneys are also our clients, asking us to perform services in Europe for them, on behalf of their own clients.

More information about HGF can be found on our website hgf.com.

HGF and its legally qualified employees are regulated by one or more of the following professional bodies and codes:

- Intellectual Property Regulation Board (IPReg) <u>Rules of Conduct for Patent Attorneys, Trademark Attorneys and other</u>
  <u>Regulated persons</u>
- Institute of Professional Representatives before the European Patent Office Code of Conduct and Regulation on Discipline
- Solicitors Regulatory Authority (SRA) <u>SRA Handbook</u>

The majority of HGF's employees are employed directly and on a permanent basis. Recruitment takes place through direct advertising on our website, through reputable agencies and on the basis of referrals from employees within our firm. The identity and right to work in their place of business of all our employees is checked.

### 16. Policies

As part of our commitment to combating modern slavery, HGF:

- Has an active policy regarding slavery and human trafficking
- Pays staff fairly for their work and above the United Kingdom's minimum Living Wage
- Acts ethically and with integrity in all our business relationships
- Identifies, assesses and monitors potential risk areas in our supply chains to mitigate the risk of slavery and human trafficking occurring;
- Protects whistle blowers.

We also ensure our clients and associates are aware of our policies, and adhere to the same high standards, by drawing attention to this document, and our policies, in our Terms and Conditions of Business. We are taking steps to draw this statement and our policy to the attention of business support suppliers, who we expect to adhere to the principles and standards set out in them.

All these documents are available for review on our Legal Documents page on our website.





#### 17. Risk and compliance

HGF evaluates from time to time the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain. Our supply chain outside the United Kingdom in relation to our services consists, on the whole, of other regulated professional service businesses like our own. We consider these to be very low risk in relation to slavery and human trafficking issues. Accordingly, other than visiting our associates from time to time, no specific action is taken with regard to these relationships.

We believe there is a very low risk of slavery or human trafficking having a connection with the firm's activities. We do not consider that we operate in high risk sectors or locations. Most of our clients require services to be performed in industrialised countries and we employ legal services that would not normally be considered a likely employer of slave labour, or low paid workers.

We require that all our suppliers adhere to our anti-slavery Policy. If we were to find evidence of a failure to comply with our policies on this and other matters (e.g. bribery or corruption) we would immediately seek to terminate our relationship with the relevant supplier.

#### 18. Training

Because we consider our business to be at a low risk of being involved with slavery and human trafficking, we do not have a specific training programme for our staff beyond making known to them on a regular basis our policy on this and other matters. Employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. They are required to comply with our bribery and corruption policy.

#### 19. Further actions and sign-off

Following our review of our actions this financial year (ending 30 April 2018), we are satisfied that our business continues to pose little opportunity for human exploitation, either directly within HGF and through interactions with our business support suppliers, or through our interactions with clients and associate law firms.

This statement, approved by the Board of HGF, is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes HGF's slavery and human trafficking statement for the financial year commencing 1 May 2017 and ending 30 April 2018.

Signature: 06/09/2018

Date

Paul Sanderson Chief Executive Office HGF Limited, 1 City Walk, LEEDS LS11 9DX



# Anti-slavery and human trafficking statement 2017

#### 20. Opening statement

HGF is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. We commit to uphold the principles of the United Kingdom's Modern Slavery Act 2015, both within the firm and through its relationships with clients and associates.

### 21. Structure of the organisation

HGF Limited is a United Kingdom company (No. 08998652) having its registered office at 1 City Walk, LEEDS LS11 9DX. Our shareholders are all employees of HGF Business Services Limited, a wholly owned subsidiary of HGF Limited. Some shareholders are also members of our law firm, HGF Law LLP (OC382146) having its registered office at the same address. We have offices in eleven UK cities.

We have two operating companies outside of the United Kingdom, namely HGF BV, a Dutch company (No. 63864606) based at Zuid-Hollandlaan 72596 AL, The Hague, The Netherlands and HGF GmbH (HGF Sari) (HGF LLC), a Swiss company (No. CHE-484.730.827) based at OBC Suisse AG, Basel-City, Aeschenvorstadt 71CH - 4051 Basel, Switzerland.

All these companies are hereafter referred to as "HGF" and this statement covers them all. HGF is an independent professional services firm within the Intellectual Property sector, providing advice to clients based in the United Kingdom and around the world. Our services are primarily in obtaining, enforcing and exploiting intellectual property rights for our clients in the United Kingdom and wider Europe.

Our clients are also interested in obtaining, enforcing and exploiting intellectual property rights elsewhere in the world and, for this, we work with a range of associates in many different countries whom we instruct to provide such services on behalf of our clients. Mostly, these associates are also clients, asking us to perform services in Europe for them, on behalf of their own clients. Most clients are commercial organisations, research and development based companies, and universities and other institutions, who make inventions and/or design new products, and/or have brands and trade marks that distinguish their goods and services. All our clients are generally concerned with the acquisition and protection of intellectual property rights to protect their business interests.

More information about HGF can be found on our website <a href="hgf.com">hgf.com</a>.

HGF and its legally qualified employees are regulated by one or more of the following professional bodies and codes:

- Intellectual Property Regulation Board (IPReg) Rules of Conduct for Patent Attorneys, Trademark Attorneys and other Regulated persons
- Institute of Professional Representatives before the European Patent Office Code of Conduct and Regulation on Discipline
- Solicitors Regulatory Authority (SRA) <u>SRA Handbook</u>

The majority of HGF's employees are employed directly and on a permanent basis. Recruitment takes place through direct advertising on our website, through reputable agencies and on the basis of referrals from employees within our firm. The identity and right to work in their place of business of all our employees is checked.

#### 22. Policies

As part of our commitment to combating modern slavery, HGF:

- Has an active policy regarding slavery and human trafficking
- Pays staff fairly for their work and above the United Kingdom's minimum Living Wage
- Acts ethically and with integrity in all our business relationships
- Identifies, assesses and monitors potential risk areas in our supply chains to mitigate the risk of slavery and human trafficking occurring;
- Protects whistle blowers.

We also make sure our clients and associates are aware of our policies, and adhere to the same high standards, by drawing attention to this document, and our policies, in our Terms and Conditions of Business.

All these documents are available for review on our Legal Documents page on our website.





#### 23. Risk and compliance

HGF evaluates from time to time the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by reviewing the associates with whom we do business. Our supply chain outside the United Kingdom in relation to our services consists on the whole of other regulated professional service businesses like our own. We consider these to be very low risk in relation to slavery and human trafficking. Accordingly, no specific action is taken with regard to these relationships.

We believe there is a very low risk of slavery or human trafficking having a connection with the firm's activities. We do not consider that we operate in high risk sectors or locations because most of our clients require services to be performed in industrialised countries and we employ legal services that would not normally be considered a likely employer of slave labour, or even low paid workers.

We require that all our suppliers adhere to our anti-slavery Policy. Very few of our suppliers are not also clients. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. If we were to find evidence of a failure to comply with our policies on this and other matters (e.g. bribery) we would immediately seek to terminate our relationship with the relevant supplier.

Our policies and procedures:

- Establish and assess areas of potential risk in our business and supply chains
- Monitor potential risk areas in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Provide adequate protection for whistleblowers.

#### 24. Training

Because we consider our business to be at a low risk of being involved with slavery and human trafficking, we do not have a specific training programme for our staff beyond making known to them on a regular basis our policy on this and other matters. Employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. They are required to comply with our bribery and corruption policy.

### 25. Further actions and sign-off

Following our review of our actions this financial year (ending 30 April 2017), we are satisfied that our business continues to pose little opportunity for human exploitation, either directly in the United Kingdom or through our interactions with overseas clients and associate law firms.

This statement, approved by the Board of HGF, is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes HGF's slavery and human trafficking statement for the financial year commencing 1 May 2016 and ending 30 April 2017.

Signature.			
Monday	_ Date	07/09/2017	

Paul Sanderson Chief Executive Office HGF Limited, 1 City Walk, LEEDS LS11 9DX



# Anti-slavery and human trafficking statement 2016

#### 26. Opening statement

HGF is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. We commit to uphold the principles of the United Kingdom's Modern Slavery Act 2015, both within the firm and through its relationships with clients and associates.

### 27. Structure of the organisation

HGF Limited is a United Kingdom company (No. 08998652) having its registered office at 1 City Walk, LEEDS LS11 9DX. Our shareholders are all employees of the firm and some are members of our law firm, HGF Law LLP (OC382146) having its registered office at the same address. We have offices in ten UK cities.

We have two operating companies outside of the United Kingdom, namely HGF BV, a Dutch company (No. 63864606) based at Zuid-Hollandlaan 72596 AL, The Hague, The Netherlands and HGF GmbH (HGF Sari) (HGF LLC), a Swiss company (No. CHE-484.730.827) based at OBC Suisse AG, Basel-City, Aeschenvorstadt 71CH - 4051 Basel, Switzerland.

All these companies are hereafter referred to as "HGF" This statement covers each of the above organisations, which in combination have an annual turnover in excess of £36million. HGF is an independent professional services firm within the Intellectual Property sector, providing advice to clients based in the United Kingdom and elsewhere around the world. Our services are primarily in obtaining, enforcing and exploiting intellectual property rights. More information about HGF can be found on our website <a href="https://example.com/hgf-

In order to provide services to our clients, we work with a range of associates around the world who provide services for our clients. Very often, these associates are also clients, asking us to perform services for them on behalf of their own clients. Most clients are research-based companies and universities making inventions and/or designing new products, and/or are commercial organisations having trade marks. In any event, all are generally concerned with the acquisition and protection of intellectual property rights.

HGF is regulated by one or more of the following professional bodies and codes:

- Intellectual Property Regulation Board (IPReg) Rules of Conduct for Patent Attorneys, Trademark Attorneys and other Regulated persons
- Institute of Professional Representatives before the European Patent Office Code of Conduct and Regulation on Discipline
- Solicitors Regulatory Authority (SRA) SRA Handbook

The majority of HGF's employees are employed directly and on a permanent basis. Recruitment takes place through direct advertising on our website, through reputable agencies and on the basis of referrals from employees within our firm. The identity and right to work in their place of business of all our employees is checked.

#### 28. Policies

As part of our commitment to combating modern slavery, the firm:

- Has an active policy regarding slavery and human trafficking
- Pays staff fairly for their work and above the United Kingdom's minimum Living Wage
- · Acts ethically and with integrity in all our business relationships
- Identifies, assesses and monitors potential risk areas in our supply chains to mitigate the risk of slavery and human trafficking occurring;
- Protects whistle blowers.

We also make sure our clients and associates are aware of our policies, and adhere to the same high standards, by drawing attention to this document, and our policies, in our Terms and Conditions of Doing Business.

### 29. Risk and compliance

HGF regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by reviewing the associates with whom we do business. Our supply chain outside the United Kingdom in relation to our services consists on the whole of



other regulated professional service businesses like our own. We consider these to be very low risk in relation to slavery and human trafficking. Accordingly, no specific action is taken with regard to these relationships.

We believe there is a very low risk of slavery or human trafficking having a connection with the firm's activities. We do not consider that we operate in high risk sectors or locations because most of our clients require services to be performed in industrialised countries and we employ legal services that would not normally be considered a likely employer of slave labour.

We require that all our suppliers adhere to our anti-slavery Policy by drawing it to their attention in our Terms and Conditions of Business, which we re-issue each year to every client. Very few of our suppliers are not also clients. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. If we were to find evidence of a failure to comply with our policies on this and other matters (e.g. bribery) we would immediately seek to terminate our relationship with the relevant supplier, which is not in their interests.

Our policies and procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers.

### 30. Training

Because we consider our business to be at a low risk of being involved with slavery and human trafficking, we do not have a specific training programme for our staff beyond making known to them on a regular basis our policy on this and other matters. Employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy.

### 31. Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we do not intend to take any further steps to tackle slavery and human trafficking beyond setting our policy on the subject and bringing it to the attention of our clients and associates when we re-issue our terms and conditions.

This statement, approved by the Board of HGF, is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes HGF's slavery and human trafficking statement for the financial year commencing 1 May 2015 and ending 30 April 2016.

Signature: 31/10/2016

Date

Paul Sanderson Chief Executive Office HGF Limited, 1 City Walk, LEEDS LS11 9DX