

The HSS Group Policy

Code of Ethics

Your guide to the HSS Group Code of Ethics

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1. General Principles

This Code acts as a **guide** to the main practices and policies through which HSS Hire Group plc and its subsidiary companies (“**HSS**”) conduct their business. This Code is fully supported by the Board, and the policies underpinning it are regularly reviewed by senior management in the light of changing business and regulatory requirements.

2. Compliance with Law

We will act at all times within the letter and spirit of all applicable laws and regulations in the jurisdictions in which we conduct business. This includes open and transparent dealings with all tax and competition authorities, as well as treating all information in our possession, both personal and corporate, as confidential. HSS follows best practice in order to comply with data protection legislation.

3. Human Rights

Modern Slavery Act 2015

Modern slavery is a crime and a violation of fundamental human rights. HSS has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners.

We aim to maintain good relationships with all our key suppliers, and expect them to adhere to similar ethical standards as ourselves. We apply Enhanced Supplier criteria, measuring them and holding them to certain standards in the key areas of sustainability, human rights, forced or child labour, equality, employee wellbeing, health & safety and anti-corruption.

We aim to trade with all suppliers on terms that are fair and reasonable to all parties, and to adhere to those terms. We have updated the sets of terms and conditions used in HSS to include a requirement to comply with law (including the Modern Slavery Act 2015), maintain and uphold policies and allow us the right to audit and terminate contracts for non-compliance.

The requirement under the Modern Slavery Act to publish an anti-slavery statement applies to companies with financial years ending on or after 31 March 2016. HSS is subject to these disclosure requirements and therefore will publish an anti-slavery statement annually.

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Employment practices

We aim to be an employer of choice in the hire industry, and to create an environment where employees are valued, and where their full potential can be developed. We have systems of recognition and reward across our business that fairly and appropriately remunerate and promote all colleagues, regardless of their role or seniority.

Whistleblowing

We provide an objective process whereby colleagues can raise, anonymously if they wish, any concerns they have over issues such as health & safety, fraud or theft, harassment or bullying, or any matter damaging to HSS or any of its stakeholders. All reports are fully investigated, with the whistleblower being kept informed throughout (where appropriate). Part of the process is reassuring colleagues that they will never face any form of reprisal or disciplinary action as a result of raising bona fide concerns in this way.

Equality & Diversity

We are committed to providing equal opportunities in all areas of our business to ensure that all colleagues are treated fairly at all stages of their careers and are given equality of opportunity in terms of training and the development of their potential.

Discrimination based on gender, religion, age, sexuality, disability or any other reason is not tolerated, as outlined below. We recognise that diversity is a source of strength in the workplace in terms of differing ideas, experience and perspectives, and aim to act in line with the protected characteristics of the Equality Act 2010.

4. Discrimination & Harassment

We do not tolerate either discrimination against any colleague for any reason whatsoever, or harassment in the workplace; instances of either are treated as gross misconduct, likely leading to summary dismissal for the perpetrator, as well as the potential involvement of the authorities. All colleagues are encouraged to report any instances either to HR or their manager, or via the whistleblowing process.

5. Health & Safety

Colleagues are empowered to maintain H&S standards through continual training and management systems designed to drive continual improvement in these areas, with particular reference to RIDDORs. All colleagues are trained and expected to take ownership in this area, and act as individual “safety champions” in their location. All accidents are reported and investigated to prevent re-occurrence. All our hire fleet is tested and maintained to a high standard before each hire to ensure it is safe to use.

6. Environment

HSS believes that hire is an intrinsically sustainable activity; we complement this by repairing and refurbishing our hire fleet as much as possible, through a national refurbishment centre. All waste is treated appropriately, and we aim to minimise landfill wherever possible. Our transport management systems are designed to minimise distances travelled, and technology is used to improve driver behaviours.

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7. **Community**

We aim to be part of each community in which we conduct business, and we encourage colleagues to actively engage with these communities. We attempt to be good neighbours, and to keep disruption to a minimum. Our “Heroes of Hire” programmes recognise and celebrate colleagues who “go the extra mile” in terms of either customers or local community initiatives.

8. **Bribery**

We fully subscribe to the principles of the Bribery Act 2010, and will not tolerate bribery or unethical conduct in any form, including the offering or acceptance of inducements, excessive hospitality or the misrepresentation of HSS’ financial or competitive position. Colleagues are trained in this area as part of their induction, and the sales force receive regular updates on this policy.

9. **Anti-Facilitation of Tax Evasion**

We take a zero-tolerance approach to facilitation of tax evasion, whether under UK law or under the law of any foreign country. We will uphold all laws relevant to countering tax evasion, including the Criminal Finances Act 2017. Training on this policy will be provided and reviewed and updated on a regular basis as the Executive consider necessary. Such training may form part of wider financial crime detection and prevention training. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach applicable policy.

10. **Political Contributions**

We do not make any political contributions.

11. **Conflicts of Interest & Transparency**

We do not tolerate conflicts of interest in our business, through any colleague having an interest in any supplier, customer or competitor of the company. Any such potential conflict would be fully investigated, and would require sign-off at Executive Director level. As a Group listed on the London Stock Exchange, HSS is also committed to best practice in its investor relations, meeting shareholders throughout the year and at the AGM, and seeking to ensure that there are no substantial links between any shareholders and colleagues that have not been declared to the company.