

HBXL Modern Slavery and Human Trafficking Statement

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Notes	Please also refer to the HBXL Staff Handbook for the following policies: • Whistleblowing Policy • Anti-harassment and Bullying Policy • Equal Opportunities Policy

1. Aims and Scope

This voluntary statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the SME HBXL Group (with turnover less than £36M) to prevent modern slavery and human trafficking in its business and supply chains.

This statement is published in line with section 54(1) of the Modern Slavery Act 2015.

2. About HBXL

HBXL was established in 2000 to provide high quality construction software to the construction industry. In 2022 HBXL launched the HBXL Skills Academy.

3. Our commitment to the principles of the Modern Slavery Act 2015

HBXL Group is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

4. Our supply chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains. Our supply chains are limited and we procure goods and services from a restricted range of UK and overseas suppliers.

Nevertheless, HBXL conducts due diligence on new suppliers, including reviewing their own modern slavery policies where available, assessing country and sector risk, and seeking contractual assurances that they do not engage in or tolerate any form of modern slavery.

5. Our policies in relation to the Modern Slavery Act 2015

The following policies are available to all staff through the HBXL Staff Handbook:

1. Whistleblowing Policy
2. Anti-harassment and Bullying Policy
3. Equal Opportunities Policy

If modern slavery is suspected or identified within our operations or supply chains, HBXL will take immediate steps to investigate, suspend relevant activities or contracts, and report the matter to the appropriate authorities.

6. Embedding the principles

We will continue to embed the principles through:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK
- ensuring that consideration of the modern slavery risks and prevention are added to HBXL's policy review process as an employer and procurer of goods and services
- making sure HBXL's procurement strategies and contract terms and conditions include references to modern slavery and human trafficking
- continuing to take action to embed a zero tolerance policy towards modern slavery
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices. These efforts form part of HBXL's wider commitment to ethical sourcing and corporate responsibility.

HBXL will monitor the effectiveness of these measures by recording and reviewing any reported concerns or incidents annually, and updating this statement as needed.

Approved by the HBXL Board on 10 August 2025.