Himly Ltd
Business Management System
Modern Slavery Act Statement

EQUALITY POLICIES

10 NOVEMBER 2026

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Rev	Date	Description	Prepared	Checked	Authorised
1	20/03/2024	First edition	JS	XSR	XSR
2	20/03/2025	-	JS	XSR	XSR
3	20/03/2026	-	JS	XSR	XSR
4	10/11/2026	Risk assessment and controls	JS/XSR	XSR/JS	XSR

1.1. Purpose

Himly Ltd is committed to preventing slavery, servitude, forced or compulsory labour, human trafficking and child labour in its business and supply chains. We expect our staff, suppliers and subconsultants to uphold this commitment.

1.2. Scope

This voluntary statement covers Himly Ltd for the financial year ended 31 December 2025, with an update dated 10 November 2026. It follows the principles of section 54 of the Modern Slavery Act 2015. The additional due diligence, training and monitoring measures below are commitments introduced by this revision, rather than activities reported as completed in 2025.

1.3. Policy

1.3.1. Our business and supply chain

Himly is a small specialist environmental consultancy operating from UK offices. We advise on environmental noise, building acoustics, air quality, sustainability, climate change and environmental impact assessment. Our work includes assessments, design advice, site surveys and monitoring for buildings, infrastructure and energy projects.

The Board of Directors is responsible for this statement, implementation and review. Our supply chain supports professional consultancy: specialist subconsultants, monitoring equipment and calibration, IT hardware and software, professional services and office supplies, together with premises, cleaning, travel and accommodation where used.

1.3.2. Risk assessment

Direct employment risk is relatively low given our small, professional workforce and management oversight. This does not remove risk in the supply chain. Priority exposures include the manufacture and raw materials of electronics, batteries and monitoring equipment. Site visits may also expose staff to signs of exploitation among other organisations' workers.

Risk assessment will consider the likelihood and severity of harm to people, supplier location, workforce arrangements and subcontracting. We will review risk when appointing suppliers, when circumstances change and at least annually. Visibility beyond direct suppliers, particularly in global manufacturing, remains limited.

1.3.3. Our approach

The existing policy requires employees to provide evidence of their right to work in the UK and encourages concerns to be raised with the Board. We require written employment terms and lawful pay and working hours. Employment must be freely chosen, with freedom to leave subject to lawful notice. We prohibit worker-paid recruitment fees, retention of original identity documents, coercion and unlawful child labour, and respect freedom of association.

We will apply proportionate supplier checks, prioritising higher-risk goods and services. Before appointment or renewal, these checks will consider suppliers' labour practices, recruitment arrangements and relevant policies or statements; where concerns arise, we will seek supporting evidence and clarification. A published statement alone will not be treated as proof that exploitation is absent.

We will communicate these expectations to suppliers and subconsultants and include appropriate requirements in new or renewed agreements, including escalation of concerns. Purchasing decisions will consider realistic fees, delivery periods and timely payment so that commercial pressure does not encourage exploitation. Relevant decisions and follow-up actions will be recorded.

1.3.4. Reporting and remediation

Employees, subconsultants, suppliers and their workers may raise concerns directly with any Himly director, using the company contact details at https://himly.com. If a director is implicated, another director should be contacted. We will handle concerns sensitively and confidentially as far as possible and will not tolerate retaliation against anyone raising a concern in good faith.

Any immediate danger must be reported to the emergency services. Directors will assess concerns promptly, prioritise workers' safety and seek specialist advice or refer matters to the police or relevant authority where appropriate. We will work with affected people and suppliers on corrective action and provide or cooperate in remedy where we have caused or contributed to harm. Suspension or termination will be considered where necessary, taking account of risks to workers rather than automatically ending the relationship.

1.3.5. Training and awareness

We will brief all staff on this statement, signs of exploitation and reporting routes, with additional guidance for those selecting suppliers or visiting sites. Warning signs include withheld pay or documents, recruitment debts, restricted movement and someone controlling workers' earnings. Briefings will form part of induction and annual refresher discussions, using Home Office and other appropriate awareness materials.

1.4. Review and effectiveness

The Board will review this statement at least annually and after material changes to operations or risk. By 30 June 2027, our priorities are to record supplier risk screening, review the suppliers identified as higher risk, brief all staff and establish a concerns and corrective-action log.

The annual review will record the proportion of relevant suppliers screened and staff briefed, concerns raised, corrective actions completed and, where relevant, outcomes for affected workers. Findings will inform improvements and progress reported in the next statement. An absence of reported incidents will not be treated as proof that exploitation is absent.

1.5. Approval and publication

This statement has been approved by the Board for approval, signed by a director and published at https://himly.com, with a prominent homepage link.

Board approval date: 9 November 2026

Signed:  Director: Xavier Sanchez-Roemmele

Date of signature: 10 November 2026