



HY-TEN GROUP

Modern Slavery Act Statement 2019

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This statement is for Hy-ten Group and covers Nightingale Homes Limited, Hy-Ten LLC, Central Rebar Ltd.

In 2019, a thorough investigation related to The Modern Slavery Act (MSA) was undertaken.

Hy-Ten is taking serious and effective steps to identify and root out contemporary slavery while maintaining a long term aim to continuously improve.

Hy-Ten has created a strategy on how to approach the requirements of MSA on a long term basis, and in the short term has invested in an independent advice project to gain confidence in establishing internal processes that support prevention, identification and elimination of any MSA issues.

Through previous MSA activities Hy-Ten Group carried out;

- a) An independent gap analysis of MSA related documentation and activities.
- b) A profile of Hy-Ten suppliers database to engage direct and indirect suppliers and to develop a due diligence system to obtain reliable and up to date information.
- c) A risk assessment undertaken on suppliers (including high risk categories four parameters of MSA in-depth evaluation) to identify and analysis the risk of human trafficking and Modern Slavery in its operations and supply chain.
- d) An evaluation of United Nations Global Compact (UNGC) risk elements and their relationship to existing policies and procedures.
- e) An action plan based on the results of the above activities.
- f) The creation of a bespoke maintenance process of internal accountability standards and procedures for employees and contractors. This task included creation of a set of KPIs to enable regular future progress reporting and options for addressing lack of engagement with suppliers.
- g) A draft programme of potential audit policy on certain countries and supply chains to enable monitoring and continuous improvement in the next few years.
- h) First series of training for staff in relation to MSA.

In the financial year 2018/2019, Hy-Ten Group has;

1. Established a framework about how to collate information on all suppliers and all methods of purchasing (goods and services) and has undertaken its first implementation round
2. Adopted a new Code of Conduct and implemented a risk assessment register for all suppliers
3. Updated and consolidated procurement practices to comprehensively refer to MSA
4. Developed an action plan for a regular update process addressing MSA and responsible sourcing issues
5. Consolidated procurement, sustainability and MSA activities to deliver a powerful and consistent message to all stakeholders, suppliers and employees alike

The process of ensuring modern slavery issues are prevented, identified, addressed and uprooted is delivered by using the following documentation across the company:

- Code of conduct
- MSA questionnaire for all suppliers
- New supplier's approval process
- Suppliers evaluation
- Antislavery and human trafficking policy (Below)
- Responsible sourcing and sustainability policy (Below)
- Stringent control and 3rd party certification of supply chains of constituent part of Hy-Ten products portfolio

Anti-Slavery

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.

Someone is in slavery if they are:

- Forced to work through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse.
- Dehumanised, treated as a commodity or bought and sold as 'property'.
- Physically constrained or has restrictions placed on his/her freedom of movement.

Human Trafficking

Human trafficking involves men, women and children being recruited, harboured or brought into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will. People don't necessarily have to be transported from one place to another for trafficking to take place.

When children are trafficked, no violence, deception or coercion needs to be involved: simply bringing them into exploitative conditions constitutes trafficking.

Hy-Ten seeks to ensure that Slavery and Human Trafficking is not present through its business operations.

Hy-Ten practices include: employee welfare; fair treatment of employees; equal opportunities in recruitment, training, promotion, work tasks, freedom of association and compliance with employment legislation.

The requirements of Ethical Trading Initiative (ETI) Base Code and standards of the International Labour Organization (ILO) are considered during issue and review of business practices. Human Resources are in accordance with minimum wage legislation or industry norms.

Reductions in wages for disciplinary matters are not permitted.

Recruitment and Social Rights is ensured: avoidance of child, slave, bonded or involuntary prison labour, the protection of human rights and the avoidance of harsh or inhumane treatment.

Employees are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice as stated in their contract.

Responsible sourcing and sustainability

Ethics

Adhere to standards of ethical behaviour applicable to our business activities.

Legislation

Review and adapt to legal requirement as set out in the above mentioned standards.

Supply Chain.

Implement and maintain a supplier base that recognises and acts upon the need to have management systems appropriate to health and safety, environmental and to the supply of constituent materials.

Identification of Stakeholders

Identify and engage with stakeholders affected by our activities and if required liaising with the local community.

Complaints and Prosecutions

Maintain records of complaints and prosecutions using the procedures contained within the current quality assurance systems.

Rights at Work

Operate within international norms concerning human rights and labour practices.

Energy Utilisation, Resource Use, Water Usage, Waste Management

Maintain and further enhance the environmental system to monitor and reduce Hy-Ten's impacts.

Operating Practices

Implement and maintain fair operating practices regarding employment and economic activities, including workforce training to achieve an efficient and safe workforce and working environment.

Sustainability of the Built Environment

Aim to develop innovative and effective products that improve the quality and sustainability of the built environment.

Continual Improvement

Hy-Ten Management commit to the continual improvement of the environmental, social and economic performance of the company and operate systems to monitor performance.

Mr Adrian Larkins Chairman,

Signature



Date 27-03-2019

Mr Ian Jeffries Nominated Person Responsible for Annual Submission

Signature



Date 27-03-2019