



# HY-TEN GROUP

Modern Slavery Act Statement 2020

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

Modern slavery is a crime, and a morally unacceptable act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

Hy-Ten has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operation and supply chain. Hy-Ten has taken concrete steps to tackle modern slavery as outlined in our statement.

This statement sets out the actions that Hy-Ten has taken to understand all potential modern slavery risks related to Hy-Ten's business, and to implement steps to prevent slavery and human trafficking during the financial year 2019/20.

Hy-Ten is a leading stockist and fabricator of concrete reinforcement bar, mesh and accessories with a nationwide network of manufacturing centres which provide an innovative, rapid and cost effective service to building and civil engineering contractors globally.

Hy-Ten establishes relationships of trust and integrity with all its suppliers, which is built upon mutually beneficial factors. Hy-Ten supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

Hy-Ten has not been made aware of any allegations of human trafficking/slavery activities against any suppliers. If made aware, Hy-Ten would act immediately to assist in eliminating any offenders from the supply chain.

Hy-Ten operates the following policies for identifying and preventing slavery and human trafficking in our operations.

**Whistleblowing Policy** – Hy-Ten encourages all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. Hy-Ten will ensure anything reported remains confidential to protect the identity of whistle-blower.

**Code of Conduct** – Hy-Ten code of conduct encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Hy-Ten conducts due diligence on all new suppliers, and on existing suppliers at regular intervals. As part of its efforts to monitor and reduce the risk of slavery and/or human trafficking occurring within its supply chains, Hy-Ten has adopted the following due diligence procedures when taking on new suppliers, and reviewing its existing suppliers.

The Supplier warrants by return of a signed declaration that neither they nor any of its officers, employees, agents or companies operating within their own supply chain has:

- Committed an offence under the Modern Slavery Act 2015 (MSA).
- Been notified that it is subject to an investigation/prosecution relating to an alleged MSA offence.
- Is aware of any circumstances within its supply chain that could give rise to an alleged MSA offence or prosecution under the Act.

Hy-Ten plans to raise awareness of modern slavery issues by provision of a fresh learning course to all employees which covers:

- Various forms of modern slavery in which people can be held and exploited.
- The size of the problem and the risk to our organisation.
- How employees can identify the signs of slavery and human trafficking.
- How employees should respond if they suspect slavery or human trafficking.
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation.
- What external help is available for the victims of slavery.

A signed confirmation from employees that they will abide by Hy-Ten Anti-Slavery Policies.

By putting up posters across our facilities and sending an email that is focused specifically on modern slavery to all our staff, which explains:

Our commitment in the fight against modern slavery  
Red flags for potential cases of slavery or human trafficking  
How employees should report suspicions of modern slavery

Hy-Ten has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain.

These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our MSA Supplier questionnaire?
- How many reports have been made by our employees giving concern or suspicion of someone who may be affected?
- What are the findings of our cross-functional Human Rights team, which reviews how we are addressing modern slavery and human trafficking?

This statement covers 1 April 2019 to 31 March 2020.

[Signature]

[Date]

26/3/20

[Signature]

  
(A) 30/3/20

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30/3/2020