

# MODERN SLAVERY ACT

## Statement

The Modern Slavery Act 2015 came into effect on 29th October 2015. The Act requires Corporate Companies supplying goods or services to the UK, and who have an annual turnover exceeding £36 million, to disclose information regarding their policies to eradicate all forms of slavery (including child, bonded & forced prison labour) and human trafficking. Section 54 of the Act specifically requires a Corporate Company to demonstrate ethical transparency within their supply chain, and within their business.

Hardscape Group Ltd ensure Modern Slavery Act compliance and wider Business and Human Rights commitments through the following due diligence and actions:

- Integrating Business and Human Rights throughout our everyday system and processes.
- Engaging our clients and colleagues on Ethical Trade, Anti-Slavery and the UN Guiding Principles for Business and Human Rights (UNGPs).
- Embedding the UNGPs, Ethical Trade and Anti-Slavery Frameworks and Principles into the sourcing and procurement practice of all our staff.
- Creating and driving a positive culture of innovation beyond our own Company regarding Business & Human Rights.

The Hardscape Group's Corporate Social Responsibility Policy, Anti-Child Labour Policy, Anti-Bribery Policy, Ethical Trade Policy, and Modern Slavery Act Statement reinforce our commitment and responsibility to respect internationally recognised human rights, in line with the principles and guidance contained in the UN Guiding Principles for Business and Human Rights, the Ethical Trading Initiative Base Code and the Anti-Slavery International Charter.

### The UN Guiding principles for Business and Human Rights:

Human Rights are fundamental principles which allow an individual to lead a dignified and independent life, free from abuse or violations.

As a business, the Hardscape Group Ltd will not tolerate, nor will be condone, abuse of human rights within any part of our business or our supply chains and will take seriously any allegations that human rights are not properly respected. This includes both modern slavery and human trafficking, where we have zero tolerance policy towards both (including child, bonded, and forced prison labour).

Globally, the model for Corporate Companies to demonstrate the practice of Business and Human Rights is outlined within the UN Guiding Principles for Business and Human Rights which is a framework based on Protect-Respect-Remedy which prohibits slavery (including child, bonded & forced prison labour), and human trafficking.

The Hardscape Group are committed to the UNGPs and in being an active part to global Corporate Human Rights solution in supply chains.

Hardscape Group Ltd are working to reduce negative impacts on people associated with our own business activity and supply chains by putting principles into practice. This involves being embedded in our supply chains and capacity building from the quarry extraction site to the delivery point, actively working with all stakeholders including workers, workers representative groups, Trade Unions, NGOs & other corporate companies to promote the UNGPs and tackle human rights abuse, including modern slavery and human trafficking, thereby demonstrating ethical transparency, as required by Section 54 of the Modern Slavery Act.

### Ethical Trade:

The Hardscape Group respect all workers and will not condone abuse of workers within any part of our business or our supply chains and will take seriously any allegations that worker rights are not properly respected. This includes Modern Slavery and Human Trafficking where we have zero policy tolerance towards both (including child, bonded & forced prison labour).

In the UK specifically, HM Government recognises certain umbrella organisations as models for good practice, such as the Ethical Trading Initiative (ETI), as modus-operandi for a UK Corporate Company to demonstrate that they trade or are working to trade ethically.

In addition, the UN also recognises the processes of these oversight bodies and NGOs for the purpose of field work to help convincingly deliver Business and Human Rights solutions in Corporate supply chains including but not limited to Modern Slavery and Human Trafficking. The Hardscape Group Ltd are full members within ETI where upon we require our supply chain partners to adopt the 9 Base Code Principles.

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The 9 Base Code Principles of ETI are:

1. No forced labour
2. Freedom of association and the right to collective bargaining are respected
3. Safe and hygienic working conditions
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment

We monitor compliance to the base code in our supply chains through our supply chain management system which requires us to regularly audit our supply chains at origin, with any non-compliance documented and on-going corrective action (where applicable) and ongoing diligence taking place regularly when Hardscape Group Ltd staff or other visitors are on site.

In early 2021 Hardscape Group Ltd achieved certification against BES 6002, the Ethical Labour Sourcing Standard, enabling us to further demonstrate to customers, partners and other stakeholders, our commitment to eliminating any possibility of trafficking or modern slavery in our supply chain.

### Our Expectations:

We have a diverse international supply chain, and engagement with our suppliers requires focused and diligent efforts to comply with these rules. We expect our suppliers not to be involved in forced, bonded, or indentured labour, child labour, involuntary prison labour, slavery, or trafficking of persons of any age at any tier of the supply chain. This includes transporting, harbouring, recruiting, transferring, or receiving or persons by means of threat, force, coercion, abduction or fraud for labour or services. Suppliers, as employers or agents, may not hold or destroy employees' identification or immigration documents, such as passports or work permits, unless required by law.

Employers and agents may not use misleading or fraudulent practices during the recruitment of employees. Workers must not be required to pay employers' or agents' recruitment fees or other related fees for their employment. Workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment and any hazardous aspects of the work.

Employers must not use threats of violence, harassment, and intimidation, or restrict workers' freedom of association or freedom of movement within or outside of company workplaces or facilities. All work, including overtime, must be voluntary, and workers shall be free to terminate their employment and leave work at any time.

### Within our Own Business:

Hardscape Group Ltd delivers appropriate training for employees at all levels, alongside relevant Tier 1 supply chain partners, to emphasize the importance of acting with integrity and in line with our commitment to deliver on the UN Guiding Principles for Business and Human Rights, the Anti-Slavery International Charter, and the Base Code Principles of the Ethical Trading Initiative.

Hardscape Group Ltd will continue to review and update its policies and procedures as required, to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or business.



Alex Warren  
Managing Director