



# **HARDSCAPE**

## **GROUP**

# **Modern Slavery and Ethical Trading Policy and Report 2026**

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# Modern Slavery and Ethical Trading Policy and Report 2026

## About Hardscape Group

Hardscape Group Ltd, (incorporating Hardscape Products Ltd & Hardscape Surfaces Ltd, known as Hardscape) - is a premier specialist in the selection, specification, and supply of innovative hard landscaping materials. From natural stones like Granite, Sandstone, Limestone, Porphyry, and Slate to bespoke concrete and clay, we deliver high-performance solutions for the UK's most prestigious public and commercial projects. Our Surfaces facility blends high-tech laser, CNC, and Waterjet technology with traditional craftsmanship to create unique, multi-material finishes.

## Our Ethical Commitment

At Hardscape, we believe that high-quality products must be matched by high ethical standards. Although we operate below the mandatory £36m turnover threshold for the Modern Slavery Act 2015, we have chosen to publish a voluntary Modern Slavery Statement since 2017. We are committed to absolute transparency and the eradication of forced, bonded, and child labour. We align our operations with BS 25700:2022, the British Standard for managing modern slavery risks. By taking a proactive, risk-based approach to our global supply chain, we ensure that our materials aren't just beautiful, they are sourced with integrity.

## Global Goals & Sustainable Development

Hardscape is proud to support the United Nations Sustainable Development Goals (UNSDGs), a global call to action to end poverty, protect the planet, and ensure peace and prosperity by 2030. The UNSDGs provide a vital framework for addressing the world's most pressing challenges, from climate change to social inequality

We recognise that true sustainability requires a balance of economic growth, environmental protection, and social equity. By championing ethical trading and sustainable material sourcing, we contribute to a shared blueprint for a fairer and more resilient future.

At Hardscape, we don't just acknowledge these goals; we strive to embed them into our daily operations.



People & Equality: We prioritize improving standards and supporting worker welfare through our Ethical Trading Initiative (ETI) alignment and membership and accreditation of the Ethical Stone Register, the UK's first ethical procurement network for the stone industry. Both these schemes have worker welfare at the heart of all their operations, aiming for fair, safe, and sustainable work.



Planet & Innovation: Through our Science Based Targets initiative (SBTi) and The Climate Pledge, we are actively working towards Goals 12 and 13 with a commitment to reach Net Zero by 2040.

By aligning our business with this global partnership, we ensure that every project we supply contributes to a more sustainable and prosperous world for future generations

# Modern Slavery and Ethical Trading Policy and Report 2026

## Modern Slavery and Ethical Procurement Policy

### Our Commitment and Governance

Hardscape Group Ltd is committed to respecting internationally recognised human rights. Our approach is aligned with the UN Guiding Principles on Business and Human Rights, the Ethical Trading Initiative (ETI) Base Code, and the Anti-Slavery International Charter.

As an Employee-Owned Trust (EOT) since June 2022, our staff are direct stakeholders in our ethical performance. Our EOT representatives hold the Board of Directors to account, ensuring that Corporate Social Responsibility is embedded in our DNA. Compliance is managed through a cross-functional team including Operations, Marketing, and Commercial heads to ensure a holistic approach to human rights.

### Policies and Risk Management

This policy is developed in collaboration with employees, suppliers, NGOs, and ethical compliance professionals. We review this policy annually or in response to legislative changes and emerging global risks.

Within our business and global supply chain, we mandate:

- Worker Freedoms: Total freedom of movement, association, and the right to terminate employment.
- Prohibitions: A zero-tolerance approach to violence, harassment, child labour, discrimination, and the confiscation of identification documents.
- Fair Recruitment: A strict prohibition on worker-paid recruitment fees and compulsory overtime.

Where breaches occur, Hardscape is committed to providing access to remedy, compensation, and justice for victims. We maintain a clear Whistleblowing Procedure to allow for the safe reporting of concerns.

### Due Diligence and Supplier Accountability

We recognize that the sourcing of natural stone carries inherent risks. To mitigate this, Hardscape:

- Assesses Salient Risks: We publish our risk data on the UK Government Modern Slavery Register.
- Audits: We conduct a rigorous mix of remote documentation reviews, announced third-party audits, and unannounced in-person site visits.
- Mutual Responsibility: All suppliers must sign our Two-Way Supplier Code of Conduct, which balances our high ethical expectations with a commitment to "financial fair play" and responsible purchasing practices.
- Logistics: We monitor shipping operations, targeting 100% conformance with International Transportworkers Federation (ITF) agreements or suitable and sufficient National rules in place for all vessels.

### Training and Effectiveness (KPIs)

We provide continuous education through toolbox talks and coaching, utilizing resources from the Supply Chain Sustainability School and the UK Home Office. All employees must sign our Employee Handbook and Code of Conduct before commencing work.

To measure our impact, we track the following Key Performance Indicators:

- 100% of high-risk suppliers audited annually.
- Zero unresolved significant ethical non-compliances.
- 100% of transport vessels meet ITF or equivalent national standards.

Detailed results of our analysis and progress are published in our annual [Modern Slavery & Ethical Trading Report](#).

### Whistleblowing & Access to Remedy

Hardscape is committed to ensuring that all workers—within our own operations and throughout our global supply chain—have a safe and confidential platform to raise concerns.

- Reporting: We maintain a formal Whistleblowing Policy that encourages good-faith reporting of any suspected illegal or unethical practices, including modern slavery, human trafficking, or health & safety violations.
- Protection for Whistleblowers: We operate a zero-tolerance approach to retaliation. Any individual who raises a genuine concern is protected from detrimental treatment, victimisation, or dismissal.
- Operational Grievance Mechanism: Aligned with the UN Guiding Principles, we provide an accessible grievance process that allows rights-holders to seek direct remedy.

Where Hardscape is found to have caused or contributed to a human rights impact, we are committed to providing or facilitating effective remedies, which may include apologies, restitution, or financial compensation as appropriate.



Managing Director  
22<sup>nd</sup> April 2026

# Modern Slavery and Ethical Trading Policy and Report 2026

## Ethical Trade Initiative (ETI)

### Our Partnership with the Ethical Trading Initiative (ETI)

Hardscape was previously a significant contributing member of the Ethical Trading Initiative (ETI), a global alliance of businesses, trade unions, and NGOs dedicated to protecting human rights at work. We are no longer members of the ETI but are still committed to align our operations with the ETI Base Code—an internationally recognised set of nine labour standards—to ensure dignity, safety, and fairness for every worker in our supply chain.

By working closely with the ETI, we have refined our Ethical Trade Policy and management controls to proactively identify and eliminate the risks of modern slavery. This collaboration allowed us to move beyond basic compliance, driving meaningful improvements in worker welfare and rights.

### Supply Chain Dynamics and Risk Mitigation

Our supply chain is intentionally streamlined, providing us with high visibility and control over our suppliers' processes. In the stone and quarrying industry, we benefit from a workforce of highly skilled tradespeople. Because these specialist skills are difficult to replicate, our industry is characterized by long-term career stability, high engagement, and minimal reliance on temporary or agency labour.

However, we recognise that certain sector-specific risks require rigorous oversight:

- **Operational Safety:** The use of heavy plant and machinery in quarrying presents significant health and safety challenges that require constant monitoring.
- **Geographic Isolation:** The remote nature of many quarries can limit traditional regulatory inspections. We mitigate this through our own comprehensive audit programme to maintain high levels of due diligence.
- **Transparency Barriers:** A historical lack of industry-specific regulation and established trade unions in some regions can reduce opportunities for collective bargaining and worker support. We bridge this gap by promoting open communication and ensuring our Supplier Code of Conduct provides workers with a voice.

	Employment is freely chosen		Living wages are paid
	Freedom of association & the right to collective bargaining		Working hours are not excessive
	Safe and hygienic working conditions		No discrimination
	No child labour		Regular employment
			No inhumane treatment

## Supply Chain Mapping & Transparency

Hardscape maintains enduring partnerships with a carefully selected network of primarily Tier 1 suppliers who hold direct control over their source quarries. This direct relationship allows us to maintain high levels of influence and visibility throughout the production process.

We have developed a comprehensive supply chain mapping and risk analysis framework, which is reviewed regularly to adapt to emerging global challenges. We believe transparency is the foundation of ethical trade; consequently, the source country for every material in our portfolio is clearly identified on our website and within individual product specifications.

# Modern Slavery and Ethical Trading Policy and Report 2026

## Our Approach to Transparency

While Hardscape is pleased to report that no incidents of modern slavery have been identified within our business or supply chain to date, we remain vigilant. We recognise a lack of reported incidents does not guarantee an absence of risk; therefore, we are committed to the continuous improvement of our transparency and the protection of every worker in our network.

## The Ethical Risk Matrix

To ensure a proactive stance, we conduct comprehensive ethical, environmental, and anti-corruption risk analyses for every supplier. Each assessment is tailored to the supplier's specific location and their performance against the 9 ETI Base Code Principles. This intelligence is integrated into our Ethical Risk Matrix, which is reviewed monthly to maintain real-time accuracy.

We employ a Likelihood x Severity (scored 1–5) model, powered by the latest global intelligence from:

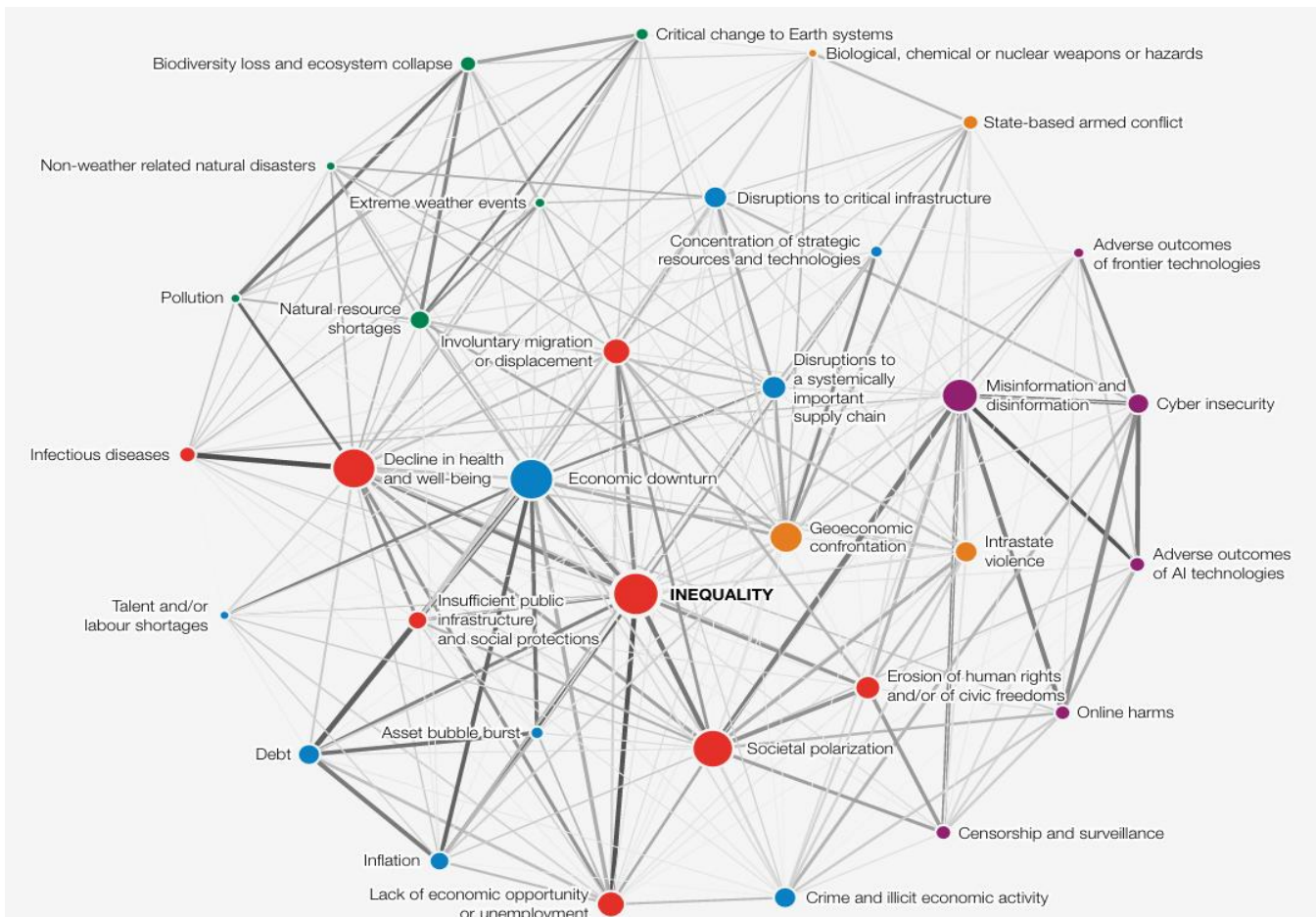
- **Strategic & Geopolitical Risk:** The World Economic Forum Global Risks Report 2026.
- **Labour & Human Rights:** The Global Slavery Index, Human Freedom Index, and the ITUC Global Rights Index.
- **Anti-Corruption & Governance:** The Transparency International Corruption Perceptions Index 2025 (published Feb 2026).
- **Environmental Performance:** The Yale Environmental Performance Index (EPI) 2024 and CDP.
- **Health & Safety:** ILO Occupational Fatality/Injury reports and WHO Health Estimate Reports.
- **Logistics:** International Transport Workers' Federation (ITF) status alerts.

Data is evaluated based on its potential to disrupt our supply chain, its impact on business operations, and its alignment with customer expectations. These indicators establish an overall risk level for each supplier profile, so we may operate with defined intervention thresholds to ensure rapid response:

- **Medium Risk (8+):** Mandates an immediate investigation and a formal corrective action plan.
- **High Risk (15+):** Triggers an immediate suspension of supply. Procurement remains halted until remedial actions are independently verified and the risk of harm is mitigated.

Suppliers identified with elevated risk levels are subject to increased audit frequency (bi-annual / quarterly) and enhanced scrutiny, including deeper information gathering, unannounced audits, and rigorous management controls to mitigate identified risks.

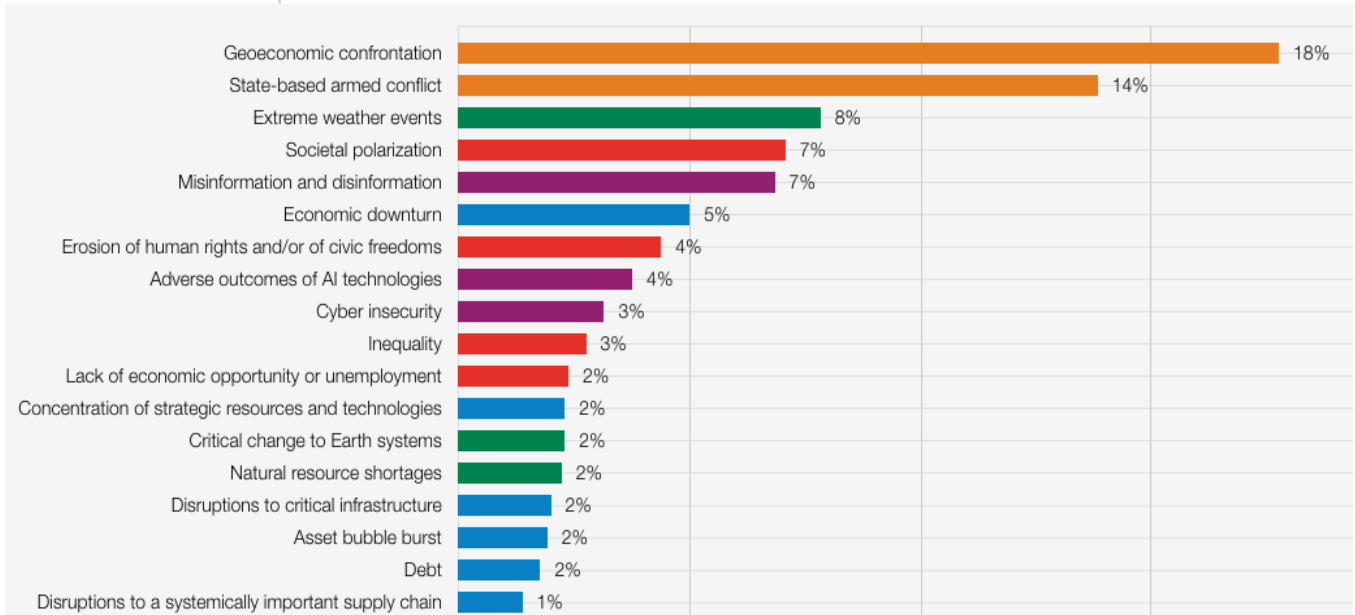
## Example: Global Risks Report: Global Risks Landscape - an interconnections map



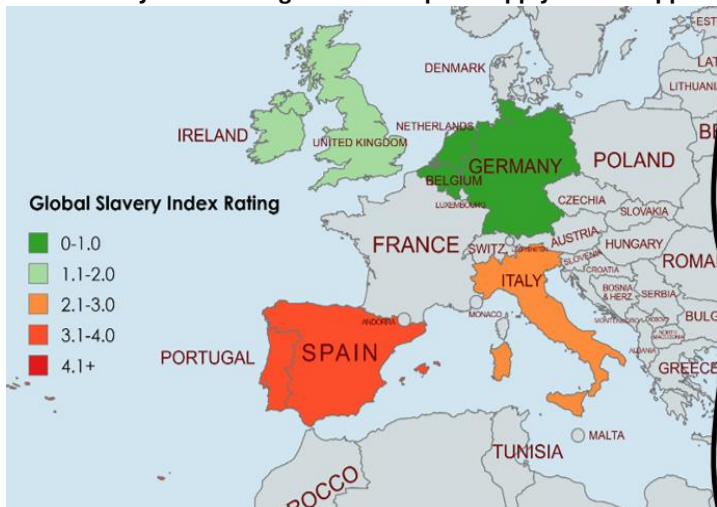
# Modern Slavery and Ethical Trading Policy and Report 2026

## Example: Current Global Risk Landscape Questionnaire response

"Please select one risk that you believe is most likely to present a material crisis on a global scale in 2026."



### Global Slavery Index Rating for Hardscape's Supply Chain Supplier Nations



### Global Rights Index Rating for Hardscape's Supply Chain Supplier Nations



# Modern Slavery and Ethical Trading Policy and Report 2026

In 2025/26 we further developed our ITF Agreement matrix to continually update our list of vessels used for our logistics operations and assess each for live ITF Agreement compliance, audit verifications, or suitable national rules in place. Vessels which do not have these controls are encouraged to gain ITF compliance or we request our materials to be loaded on the next compliant vessel.

ITF Status	Number of vessels	%
<b>Covered by an ITF Agreement</b> (Preferred Status)	<b>94</b>	<b>57%</b>
<b>Suitable National Rules Apply</b> (Acceptable Status)	<b>71</b>	<b>43%</b>
<b>Recent ITF Audit Passed</b> (Flag of Convenience, but Audited)	<b>1</b>	<b>1%</b>
<b>NOT covered</b> (Action Required)	<b>0</b>	<b>0%</b>
<b>Total</b>	<b>166</b>	

## Auditing our Supply Chain

As an ISO 9001-certified organisation since 2006, we maintain a rigorous commitment to quality and ethical integrity. We manage our supply chain through a proactive regime of site inspections and quality audits, underpinned by long-standing partnerships with trusted suppliers.

Central to our approach is our mutual Code of Conduct, a 2-way agreement signed by all partners that establish shared accountability for human rights and ethical standards. Our audit managers receive continuous professional development in modern slavery prevention, ethical procurement, and environmental compliance.

To ensure comprehensive oversight, we employ a hybrid auditing model; combining in-person inspections, remote assessments, and independent third-party evaluations. We approach every engagement with cultural sensitivity and a strict adherence to both local customs and international labour standards, ensuring our suppliers share our commitment to a fair and transparent supply chain.



## Accountability

Top-level oversight is central to our strategy. The Operations Manager reports all salient risks to the Board of Directors monthly, ensuring the necessary resources are allocated to resolve ethical issues. For full public accountability, our primary risks are disclosed on the UK Government Modern Slavery Register, driving our ongoing mission to lead the industry in worker welfare.

# Modern Slavery and Ethical Trading Policy and Report 2026

## Natural and Manufactured Stone Industries' Commonly Perceived Risks

The natural stone and quarrying industries face significant ethical risks, primarily concentrated in developing regions where labor-intensive, often unregulated, artisanal, and small-scale mining (ASM) occurs. Key risks include the widespread use of child labor, bonded labor, and severe health hazards like silicosis. These issues are driven by high demand for low-cost materials, creating a "race to the bottom" in terms of labor and safety standards, which can be addressed through initiatives like the Ethical Stone Register.

An assessment of the Natural Stone industry's salient risks has identified the following areas of concern:

### 1. Human Rights and Labour Exploitation

- **Child Labour:** An estimated 1 million children work in artisanal and small-scale mining (ASM) globally, often breaking stones, hauling loads, or working in pits, particularly in India, China, and Africa.
- **Bonded and Forced Labour:** Many workers, particularly in India, are trapped in debt bondage, where they work to pay off debts to employers, often for generations.
- **Hazardous Working Conditions:** Workers operate without protective equipment (masks, gloves), more frequently now in high-temperature environments, often facing long hours and exposure to toxic dust and fumes.
- **Lack of Legal Protection:** Many quarries operate illegally, meaning workers are undocumented and have no recourse for safety or wage issues.

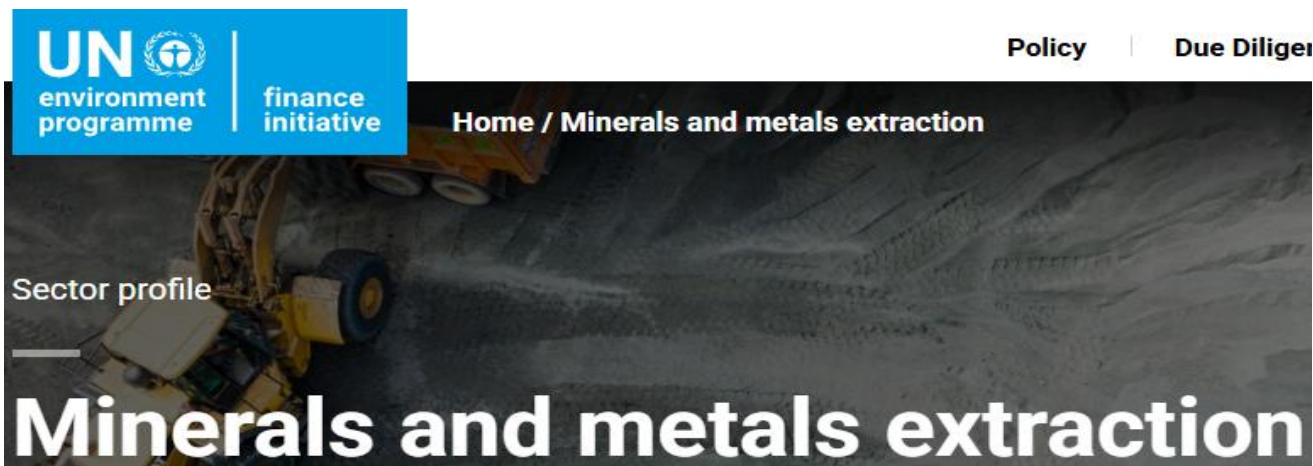


### 2. Occupational Health and Safety Risks

- **Silicosis:** Workers in silica-rich quarries (sandstone/granite) face an incurable lung disease often mistaken for TB, causing premature death.
- **Fatal Accidents:** Poor safety standards regarding explosives, falling rocks, and machinery lead to high rates of injury and death.
- **Long-term Debilitation:** Constant exposure to dust and vibration results in chronic respiratory, ocular, and physical health problems.

### 3. Environmental and Community Impact

- **Environmental Degradation:** Quarrying creates massive ecological disruption, including deforestation, biodiversity loss, and habitat destruction.
- **Water Contamination:** Runoff from quarries can contaminate local water sources with waste, affecting water availability for surrounding communities.
- **Land Degradation:** Surface mining destroys productive agricultural land, leaving behind abandoned pits that are often filled with contaminated rainwater.



### 4. Supply Chain and Corporate Governance

- **Lack of Traceability:** Many importing companies cannot trace their stone back to the original quarry, allowing products tainted with labor abuses to enter global markets.
- **Corruption:** Poor enforcement of labor laws is often coupled with corruption, where local officials may fail to inspect or regulate quarries, as seen in reports on Indian sandstone.
- **Short-termism:** The focus on maximizing profit leads to ignoring the long-term social and environmental costs, which are borne by the local communities.

# Modern Slavery and Ethical Trading Policy and Report 2026

## Hardscape's Salient Risks & Actions

Hardscape has reviewed the common industry risks against our own supply chain controls, audits, and knowledge and believe our current salient risks within our business and supply chain are:

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### Risk Profile 1: China Supply Chain Exposure

There is a heightened risk of modern slavery in China, with a reported prevalence of 4 in 1,000 individuals (Global Slavery Index 2023). Key systemic concerns include debt bondage, child labour, and significant health and safety lapses, with 9,421 injuries per 100,000 workers reported (ILO 2024).

These risks are compounded by a low government response rating (39.7 on the Walk Free index) and logistical barriers. Specifically, the rural and remote nature of quarry sites restricts direct oversight, while cultural and language barriers can impede transparent information sharing during audits.

### Mitigation Strategy / Action Plan

To ensure compliance with zero-tolerance policies regarding inhuman treatment, we are intensifying remote auditing protocols. This includes increased auditor-led visual verification via high-frequency photo and video documentation. Furthermore, we are engaging a specialized third-party auditing firm to conduct formal on-site assessments. This partner will provide the linguistic and cultural expertise necessary to navigate local norms while ensuring rigorous ethical standards are upheld.

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### Risk Profile 2: India Supply Chain Exposure

India presents a high risk for modern slavery, with a prevalence rate of 8 per 1,000 individuals (Global Slavery Index 2023). Critical areas of concern include child labour, debt bondage, and significant occupational hazards, evidenced by a high mortality rate of 35.8 deaths per 100,000 (WHO 2021).

Oversight is challenged by a modest government response score of 46.2 and the extreme geographic isolation of rural quarry sites. These logistical hurdles make it difficult to establish regular, direct contact with the workforce to verify ethical treatment and safety standards.

### Mitigation Strategy / Action Plan

To mitigate these risks, we are implementing a two-tier verification approach. We will engage a local NGO with specialized knowledge of the Rajasthan stone industry to conduct unannounced social and ethical audits. This ensures an "on-the-ground" perspective that is sensitive to local socio-economic nuances. Additionally, we will supplement these visits with digital remote audits—utilising video protocols established during the pandemic—to maintain consistent visibility in areas where physical access remains a challenge.

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### Risk Profile 3: Occupational Lung Disease (Silicosis & Mesothelioma)

The stone manufacturing sector faces a critical risk from airborne respirable crystalline silica (RCS) dust. Global data indicates more than 230 million workers are exposed annually, with engineered stone posing the highest threat due to silica concentrations of up to 97%.

Recent findings revealed that 21% of screened workers had developed silicosis. Silica is a confirmed Group 1 carcinogen responsible for roughly 7,000 global lung cancer deaths each year. The risk is intensified in facilities with poor ventilation, inadequate Personal Protective Equipment (PPE), or a reliance on "dry cutting" methods.

### Mitigation Strategy

To eliminate the hazards of respirable crystalline silica (RCS), we are mandating a transition to wet-cutting processes, wherever practicable, which reduces exposure by up to 35 times compared to dry methods. To ensure transparency and industry leadership, we have implemented a continuous air monitoring program and robust dust-mitigation protocols at our facility. Furthermore, we are extending this oversight to our supply chain through dedicated audit modules and questionnaires designed to evaluate worker risk and control efficacy.

Suppliers are now required to provide LEV maintenance logs and annual spirometry results for at-risk personnel, with compliance verified via technical safety audits. Where the controls fall short, we will work with suppliers find methods, equipment, appropriate systems, or RPE to ensure the safety of workers throughout our supply chain.

# Modern Slavery and Ethical Trading Policy and Report 2026

## Action, Remedy & Continual Improvement

If a worker is identified as a victim of modern slavery or ethical mistreatment, we will immediately involve the relevant authorities or NGOs to ensure appropriate legal intervention. We commit to following all official guidance while simultaneously auditing our internal policies, training programs, and supplier protocols. Our priority is the victim's safety; we will take decisive steps to provide protection, remediation, and financial compensation. Furthermore, we support our employees with the necessary leave to escape exploitative circumstances and require our supply chain partners to uphold these same protective standards. To encourage transparency, we advocate for the use of anonymous reporting tools like the 'Unseen' app across our network.

To ensure long-term improvement, we actively research industry best practices through webinars, peer networking, and professional reports. This insight updates our internal training materials, which are reviewed annually. Supported by in-house CPD trainers and external experts, we deliver ethical awareness training not only to our staff but also to our suppliers and stakeholders. As members of the Supply Chain Sustainability School, we leverage high-quality resources to continuously evolve our ethical standards and drive positive change across the industry.

## Developments Planned for 2026/2027

We are planning to:

- Create our own online portal survey to send to suppliers with bespoke questions, reduced admin requirements, and in clearer language to support suppliers who do not have English as a first language.
- Closely monitor shipping risks to mitigate and guard against the risks from conflict in the middle east / gulf states and the current blockades in the Strait of Hormuz.
- Carry out new style 2-way audits with improved RCS Dust exposure questions with all suppliers at least once by end of 2026. Our key priority to ensure they all can give feedback to us.
- Maintain close relationships between suppliers, Sales Managers, Compliance, and Commercial Teams, sharing specific survey results with all teams where appropriate.
- Improve our Ethical Risk Matrix to make more accessible to all potential users to increase use, engagement, and Director scrutiny, including:
  - Improving clarity and ensuring terms / language is common or explained.
  - Segregate information to sit KPI data alongside comments to give context and reasoning.
  - Add benchmarking to show how far from expectations each risk is.
  - Simplify key data to remove unnecessary or excessive information and reduce admin time.
  - Improve hyperlinks to where the data is referenced to allow further scrutiny and support general education and transparency.

Hardscape will continue to review, update, and publish its Modern Slavery and Ethical Policy and Statement, and procedures annually or as required, especially where we find evidence of unethical practices, to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or business.



Managing Director  
22<sup>nd</sup> April 2026

# Modern Slavery and Ethical Trading Policy and Report 2026

We request all our suppliers and stakeholders to share the following information with our supply chain workers. We encourage all employees and employers to report any signs of modern slavery & exploitation to the appropriate authority.

Hardscape has selected the UNSEEN charity and the Global Modern Slavery Directory as the best source of guidance, support, and action to tackle modern slavery in all its forms.



**Unseen** is a UK charity who provide safehouses and support in the community for survivors of trafficking and modern slavery. They also run the UK Modern Slavery & Exploitation Helpline and work with individuals, communities, business, governments, other charities, and statutory agencies to stamp out slavery for good.

It is free, open 24/7, confidential, and independent, and can refer cases to the police where appropriate or discuss options with victims. The Helpline puts the victim at the heart; adult victims can decide what services or help they want or don't want. Calls can be taken in over 70 languages.

Call 0800 0121 700 or for Online reporting visit the website at: [www.modernslaveryhelpline.org/report/](https://www.modernslaveryhelpline.org/report/)

The Unseen App makes reporting to the Helpline even quicker and easier, helping more people out of slavery. You don't even need to give your personal details.

Google Play: [https://play.google.com/store/apps/details?id=com.unseen.unseenApp&hl=en\\_GB](https://play.google.com/store/apps/details?id=com.unseen.unseenApp&hl=en_GB)

Apple Store: <https://apps.apple.com/gb/app/unseen/id1401303554>

For international and local support, the Polaris managed Global Modern Slavery Directory (GMSD) is an interactive, searchable map and database of organizations and agencies across the globe that address the issue of modern slavery and human trafficking. The website and map can be found here:

<https://globalmodernslavery.org/>

## Indicators of Modern Slavery

These indicators are usually related to other common problems or personality traits, but the appearance of several of these may indicate a person is a victim of modern slavery.

- Non-verbal, unwilling to talk freely, or self-isolating.
- Allowing others to speak for them.
- Being transported to and from work under supervision.
- Bank details or payment details being made to a 3<sup>rd</sup> party.
- Tells personal stories with errors or inconsistencies.
- Injuries consistent with grabbing, punching, or restraint.
- Malnutrition, poor hygiene, or regular illnesses.
- Lack of or no control of identity documents.
- Limited social interaction, especially outside of work.
- Consistent and ongoing fear, anxiety, or depression.
- Inability to regulate emotions or trust people.
- Inability to concentrate or memory difficulties.
- Hostility, aggression, self-harm, or low self-esteem.
- Unexplained or poorly explained absences for long periods.
- Absences communicated by a 3<sup>rd</sup> party.

**Your report could mean somebody's freedom.**