



Modern Slavery and Human Trafficking Statement

Summary of steps taken during 2022 to ensure slavery and human trafficking isn't taking place in either our group companies', supply chains, or businesses.

Hexadex Group continued to monitor and maintain our external whistleblowing hot line, now in its second full year of operation. This operates alongside our well-established external advice line. We continue to remind employees of its existence and create an environment in which any employee or supplier may feel confident that any report (not just about modern slavery) is treated confidentially, if they wish, and is taken seriously. In support of this, translations have been procured to allow employees to have access via their indigenous languages, and we continue to expand this capability.

Our trading terms and conditions have been revised to include a new right of audit for some subsidiaries to physically inspect suppliers. The terms and conditions also contain an obligation to comply with our mandatory policies, one of which is Modern Slavery and Human Trafficking, a new policy released in June 2022.

Our core training programme has been revised and includes a requirement for all current and new employees throughout the Hexadex Group to complete e-learning courses that include the Hexadex Group Code of Ethics and Modern Slavery and Human Trafficking Awareness.

Eminox continued to collaborate closely with the Slave-Free Alliance who helped conduct a Modern Slavery Gap Analysis in October 2022 to identify potential improvement areas following discussions with employees, a review of specific policies and procedures, and a review of its Modern Slavery statement. Eminox implemented a modern slavery strategy which includes a new steering group focused on the modern slavery agenda and executing the company's action plan. The steering group has considered the key risk areas from using temporary labour, new supplier onboarding and subsequent supplier management within the recently established Slovakian manufacturing facility.

Teconnex recognises the greatest modern slavery risk could arise from supply chain and recruitment in India, Mexico, and Romania. In response to this Teconnex has:

- Provided specific training to all employees in relation to modern-day slavery, human trafficking, and the Hexadex group Code of Ethics.
- Introduced specific modern slavery and human trafficking risk analyses within their supplier approval process.
- Introduced specific modern slavery and human trafficking risk monitoring within their supplier development processes.
- Further developed their active monitoring processes, with external expert advice in all manufacturing regions.

Ceramex will conduct a Gap Analysis in July 2023, in association with the Slave-Free Alliance with the aim to review policies and procedures, identify any potential modern slavery risk and make improvements where required.

About our business

What we do

- Designers, manufacturers and servicers of stainless steel and other exhaust systems including exhaust after treatment systems.
- Designers and manufacturers of catalyst filled cans.
- Manufacturers of purpose designed clamps and industrial couplings.
- Design, manufacture and supply of metallic expansion joints and bellows assemblies and the supply of rubber bellows, metallic and PTFE hose assemblies, fabric compensators and other engineering products.
- Assemblers of Li-ion battery packs for leisure and domestic energy storage and the incorporation of them into energy storage systems.
- Providers of cleaning systems and services for diesel particulate filters. Replace and repair diesel particulate filter bracket by welding. Restoration of diesel particulate housings through surface treatment.
- Re-conditioning of exhaust mufflers. Remanufacture of exhaust after treatment systems, including replacement of catalyst, cleaning of filters and external system to industry standard.
- Design and build of food/packaging machinery including test commissioning, control system design, build, software installation and service.
- Property Owners.

Where we operate

- We have sites in the UK, Romania, India, Mexico, Slovakia and joint venture partners in China, India, Japan, and the USA.
- Our supply chains are global with some steel, for example, coming from South Africa while components are sourced from the Middle East, China, and the USA, in addition to the EU and EFTA countries.

Organisational Structure

- Our group consists of companies per the headcount section below.
- Eminox PTE Limited is a wholly owned subsidiary of Hexadex operated on its behalf by Eminox.

Headcount as at 31st December 2022 is as follows:

Company	Full time employees	Agency
Hexadex Ltd	25	-
Eminox Ltd (including Eminox PTE)	283	32
Teconnex Ltd (including Bellows Technology Ltd)	399	99
Teconnex Europe	177	39
Teconnex Mexico	202	62
Teconnex India	38	101
Ceramex	62	1
CWM Automation	47	0

Consolidated Turnover in 2022 was £197m.

Top 3 risks relating to slavery and human trafficking are:

- Use of agency temporary staff and recruitment of permanent staff.
- Presence in Eastern Europe, especially given the exodus of refugees from Ukraine.
- Tertiary suppliers, especially SMEs.

Procedures in place to tackle those risks are:

Supply chain

- In **Teconnex** there is a supplier approval process including sector designation and risk analysis. There is also a supplier development process incorporating prioritised risk analysis of compliance.
- **CWM Automation** has introduced the following:
 - The suppliers of complex components must evidence their own modern slavery statement.
 - Their current service contact agreements state that all staff are to be paid the living wage.
 - For SME suppliers, making sure all employees are paid a fair wage.
- **Eminox** is continuing with their supplier approval process and a purchasing committee to review new suppliers. They have developed a supplier risk assessment process to cover existing suppliers. Supply chain management has continued with desk top supplier audits to supplement in person audits.

HR

- Right to work (in UK) checking process formulated.

Other

- None at present.

Organisations we work with or to which we subscribe to reduce the risk and help us if any cases are identified are:

- Slave Free Alliance
- Protect
- West Yorkshire Anti-Slavery Partnership.

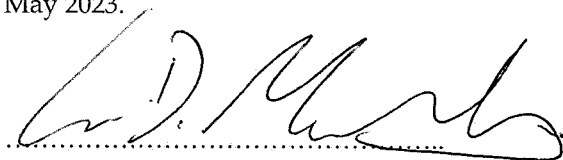
Training we require to be completed:

- All employees must complete an ethics e-learning module.
- All employees must complete a Modern Slavery Awareness e-learning module.

KPIs to monitor progress:

- These continue to be developed and include:
 - **CWM Automation** is benchmarking made-to-order components to ensure a fair price is paid.
 - Enhanced Modern Slavery and Human Trafficking Awareness training has been completed in **Eminox** for defined areas of the business - Quality, Supply Chain, HR, and Heads of Departments within the business.
 - Our Group e-learning facility (Code of Ethics and Modern Slavery) allows monitoring of the % of employees who have completed assigned modules. The target for 2023 is 95% (2022: 60%).

This is the Hexadex Ltd group **Modern Slavery Statement** for the year to 31st December 2022, reflecting post year end developments where appropriate. It is made pursuant to S54 Modern Slavery Act 2015 and signed on behalf of the board pursuant to delegated authority to do so by its Chairman, William David Milles, on 11th May 2023.



W D MILLES
Chairman