

Hy-Ten Ltd Modern Slavery Act Statement

This statement is for Hy-ten Ltd and covers the following sites: Richmond (Head Office), Staines, Chatham, Bootle, Newark, Wolverhampton, Poole, Coseley, Durham and Newton Abbot. 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.

An external company, Intertek, delivered the following work packages:

- 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 analyse 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 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



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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
- Responsible sourcing and sustainability policy
- Stringent control and 3rd party certification of supply chains of constituent part of Hy-Ten products portfolio

Mr Adrian Larkins Chairman,
Signature



Date 27-03-2019

Mr Ian Jeffries Nominated Person Responsible for Annual Submission
Signature



Date 27-03-2019

