

MODERN SLAVERY ACT

Statement

The **Modern Slavery Act 2015** came into effect on 29th October 2015. This law requires Corporate Companies supplying goods or services to the UK, and 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), human trafficking. Section 54 specifically requests a Corporate 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 through out 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.

Hardscape Group Ltd CSR Policy, Anti-Child Labour Policy, Anti-Bribery Policy, Ethical Trade Policy, and Modern Slavery Act Statement reinforces our commitment and responsibility to respect internationally recognised human rights in line with the principle 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 and individual to lead a dignified and independent life, free from abuse or violations.

As a business 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 we will take seriously any allegations that human 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).

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 on Protect-Respect-Remedy which prohibits Slavery (including child, bonded & forced prison labour), and human trafficking (refer http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

Hardscape Group Ltd 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 in Britain or Ireland actively working with all stakeholders including Workers, Workers representative Groups, Trade Unions; NGOs & other Corporates to promote the UNGPs to tackle human rights abuse, including Modern Slavery and Human Trafficking, demonstrating ethical transparency as required by Section 54 of the Modern Slavery Act.

In addition, Hardscape Group Ltd actively lead in both the UK and Irish Business and Human Rights Forums and whose active work is recognised by the UNHRC.

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Anti-Slavery International:

In 2017 the International Labour Organization estimated that there was a minimum of 40 million people in slavery across the world. Slavery, forced labour and child labour persist in the world because they are permitted to exist and Ending these human rights abuses depends on changing fundamentally the way we, as a society, set the laws, policies, customs and practices that govern how we establish and conduct employment, trade and development.

Hardscape Group Ltd work with Anti-Slavery International to bring about the fundamental changes necessary to tackle and eliminate slavery empowering those vulnerable to slavery and to transform exploitative practices into decent work. Through processes of due diligence and active programmes we close the gaps in policies and practices within our business activity and supply chain to assure that unscrupulous exploitation, including Modern Slavery and Human Trafficking, of human beings does not exist. Details on the Anti-Slavery International charter, work, including activists, is available here: <https://www.antislavery.org/anti-slavery-charter/>

Ethical Trade:

Worker Rights are a group of legal rights and claimed human rights having to do with labour rights between a workforce and their employers, usually obtained under labour and employment law to ensure a worker can labour free from exploitation & discrimination, in conditions of freedom, equity and security. Hardscape Group Ltd respect workers, and we will not condone abuse of workers within any part of our business or our supply chains and we 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, for example, Anti-Slavery International, the Ethical Trading Initiative (ETI), and the Gangmasters Licensing Labour Authority (GLLA) 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. Hardscape Group Ltd have graduated to achiever status ranking within the internal system of reporting by ETI please refer to: <http://www.ethicaltrade.org/about-eti/our-members> This means that due diligence has been completed by 3rd Party ethical audit for the purpose of ETI Base Code compliance. The ETI Base Code is found here: <https://www.ethicaltrade.org/eti-basecode> Subsequently 2nd party semi-announced or announced audits have taken place over the decades of Trade 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. Representatives of FCO Human Rights, Human Rights Ireland, Anti-Slavery International, the Dalit Solidarity Network, the ETI, the Human Rights Commission have visited various production sites throughout our supply chain with such activity ongoing as required or requested. Hardscape Group Ltd are recognised as a good model of an SME achieving the ETI Base Code and as a responsible brand that actively resolve labour rights issues and human rights, including Modern Slavery and Human Trafficking, in our supply chain.

Within our Own Business:

Hardscape Group Ltd conducts face to face training for all employees and Tier 1 supply chain workers to emphasize the importance of acting with integrity and in line with our committed work, beyond paper CSR, to deliver the UN Guiding Principles for Business and Human Rights, the Anti Slavery International Charter and the Base Code Principles of the Ethical Trading Initiative. Professionally qualified to train our Group Head of Global Supply and outside 3rd Party Officers incorporate training and guidance regarding the Modern Slavery Act into Company Staff career evolution.

Hardscape Group Ltd will continue to 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.

Mathew Haslam

Managing Director

