

Modern Slavery Act & Ethical Trading Statement

Hardscape Group Ltd, incorporating Hardscape Products Ltd & IP Surfaces Ltd (furthermore known as Hardscape) offer a specialist service for the selection, specification, and supply of innovative, diverse, and high-quality hard landscaping products utilising high performance, cost effective, and ethically sourced materials. The type of materials offered include paving, setts, cladding, artwork, and street furniture using natural stone such as Granite, Sandstone, Limestone, Porphyry, and Slate or manufactured concrete and clay products with metal or wooden accessories and detailing. Operating from offices throughout the UK.

Hardscape has an extensive portfolio of prestigious hard landscaping schemes encompassing urban, civic & public realm, commercial, and private projects.

IP Surfaces is a manufacturing facility, capable of cutting, shaping, finish texturization, and enhancement of multi-material hard surfaces utilising the latest hi-tec laser technology, mechanical processes and artisan, handcrafted techniques.

The Modern Slavery Act 2015 came into effect on 29th October 2015. The Act requires 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 business and supply chain. Although Hardscape have yet to achieve the threshold for mandatory publishing of our Modern Slavery Statement, we have published this voluntarily since 2017 in line with our commitments to improve Human Rights.



Modern Slavery Act & Ethical Trading Statement



Modern Slavery Policy

Hardscape has a commitment and responsibility to respect internationally recognised human rights, in line with the UN Guiding Principles on Business and Human Rights, the Ethical Trading Initiative Base Code, and the Anti-Slavery International Charter. This policy has been created through collaboration with all stakeholders including Employees, Suppliers, Industry Advisory Groups, Non-governmental Organisations (NGOs), and ethical compliance professionals from other businesses. This policy is reviewed annually, or when potential changes may be required due to UK or international legislative changes, identification of significant risk developments, or when new technologies and processes allow for improved control or management of risks.

Hardscape has been an Employee-Owned Trust (EOT) since June 2022, which means our staff are key stakeholders in the business. We all strive to ensure the effective ethical control of the business, and the EOT representatives hold the Directors to account in all areas of Corporate Social Responsibility. We are committed to cross departmental collaboration to achieve ethical compliance, using a team comprising of heads of Operations, Compliance, Marketing, and Commercial departments to guide our ethical, social, and environmentally sustainable goals and actions.

Hardscape will always strive to ensure, within its own business and supply chain; Freedom of Workers to Terminate Employment; Freedom of movement; and Freedom of association. Hardscape will also ensure our business and supply chain will prohibit and protect workers from: Any threat of violence, harassment, and intimidation; The use of worker-paid recruitment fees; Compulsory overtime; Child labour; Discrimination; or Confiscation of workers' original identification documents. Where these freedoms or prohibitions are breached, Hardscape will do our utmost to provide access to remedy, compensation, and justice for victims of modern slavery.

Hardscape ensures Modern Slavery Act and Ethical Trading compliance through embedding Human Rights, Ethical Trade and Anti-Slavery Frameworks and Principles into the sourcing and procurement practices, engagement with our clients and colleagues, creating a positive ethical culture for our staff through effective recruitment, internal training & development, and through innovation of our systems and processes. We supply regular training, coaching, toolbox talks, and information to our employees in close conjunction with our HR Team, using resources from areas such as the Supply Chain Sustainability School, the Independent Anti-Slavery Commissioner, and the UK Home Office Modern slavery training: resource page. Our Employee Code of Conduct refers to ethical practices and modern slavery awareness & prevention, which must be agreed to and signed prior to commencing employment. Our Supplier Code of Conduct also refers to ethical practices and modern slavery awareness & prevention, which must be accepted and signed by an authorised supplier representative prior to onboarding of new suppliers, and annually for all businesses within our supply chain.

Hardscape assesses all ethical and slavery potential and actual risks with the business throughout our supply chain, and will publish information about our salient risks, with current actions in place to mitigate or reduce those risks. We carry out regular remote and documentation audits with our supply chain, as well as 3rd party or in-person announced or unannounced audits on our supply chain, to ensure we have full visibility and appreciation for the risks of unethical practices. One of our main KPIs is to have 100% of suppliers audited annually and achieve 0 significant risks or ethical non-compliance within our suppliers. We also monitor the shipping and logistical operations, where we aim to confirm an International Transportworkers Federation agreement or suitable National Rules conformance with 100% of transport vessels used to carry our materials.

Alex Warren
Managing Director

Modern Slavery Act & Ethical Trading Statement



Ethical Trade Initiative (ETI)

The UK Government recognises certain umbrella organisations as models for good practice, such as the ETI, as modus-operandi for a UK business 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 deliver Business and Human Rights solutions in supply chains. The Hardscape Group Ltd are full members within ETI where upon we require our supply chain partners to adopt the 9 Base Code Principles which 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.

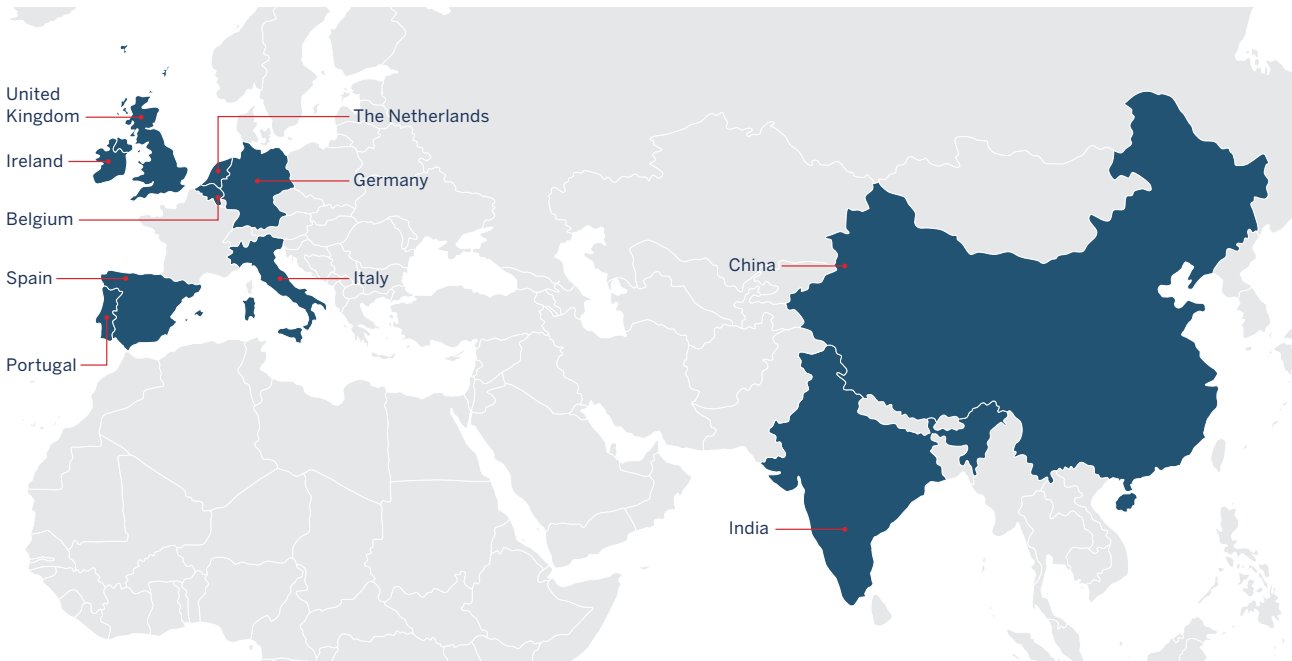
Our continued ETI membership requires a significant commitment of time, diligence, and support to attain the requirements of its Corporate Transparency Framework, which was successfully attained from its inception in 2023. Hardscape attend development meetings, group progression workshops, sector meetings, and “deep dive” sessions to improve our own and other companies’ knowledge and competence of ethical procurement controls and practices. This work has significantly improved the understanding of our own supply chain ethical risks, and how we can work with all stakeholders to improve workers’ rights and protection from harm.



Supply Chain

We have long-standing relationships with our supply chain, mostly consisting of Tier 1 suppliers, who directly control the source quarries. We have created and regularly review our supply chain mapping and risk analysis. The source country of all our materials is available to view on our website and within the description of every material offered. There is also a filter to allow selection and review of each source country's materials that can be used by customers. The supplier's name and exact locations are omitted due to commercial sensitivity and protection.

Hardscape Supply Chain Map



We carry out comprehensive ethical risk analysis of each supplier location country, region, and specific analysis of each of the ETI's 9 Base Codes to give a complete picture of the risks and areas to focus attention. We record the information on our Ethical Risk Matrix, which contains data from the World Health Organisation (WHO) Health Estimate Reports, the Global Slavery Index, Responsible Sourcing Tool industry risk mapping, the International Labour Organisation (ILO) Occupational Fatality and Injury reports, and the International Transportworkers

Federation (ITF) status reports, The Labour Rights Index, The Human Freedom Index, the Press Freedom Index, and the ITUC Global Rights Index. The Ethical Risk Matrix is reviewed monthly and salient and urgent risks are communicated to the Directors through a monthly report created by the Operations Manager. This is discussed at the Directors Monthly meeting, ensuring top-level agreement or support of actions to reduce risks or mitigate harm.

Modern Slavery Act & Ethical Trading Statement



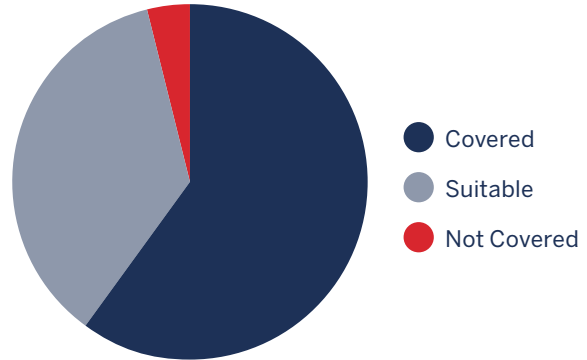
Salient Risks

Our current salient risks identified are:

- Ensuring that working conditions are safe and hygienic. Recent major incidents in the UK have elevated this concern, leading to swift immediate investigation and support to avoid recurrence.
- India – High risk of slavery (8 per 1000 people: Global Slavery Index 2023) inc. debt bondage, child labour, and a lack of sufficient Health & Safety controls (35.8 deaths per 100,000 WHO Mortality report 2021).
- China - High risk of slavery (4 per 1000 people: Global Slavery Index 2023) inc. debt bondage, child labour, and a lack of sufficient Health & Safety controls (9,421 injuries per 100,000 ILO report 2024).
- Freight shipping from Asia to the UK. Higher likelihood of Flags of Convenience or lack of ITF agreements (60% covered by ITF agreement, 36% have Suitable National Rules which apply) in vessels travelling from Asia, leading to unmonitored and unverified activity.

ITF Status	Number of vessels	%
Covered by an ITF Agreement	47	60%
Suitable National Rules Apply	28	36%
NOT covered - Action Required	3	4%
Total	78	

ITF Vessel Status



- Ensuring that no harsh or inhuman treatment is allowed. Due to the location of quarries being predominantly rural and difficult to access, direct or regular contact with workers to ascertain if abuses occur in remote locations is more unlikely.
- Ensuring Freedom of association and the right to collective bargaining by our work force is respected. Again, a lack of direct access to the workers and limited collective bargaining or Unions in place needs further collaboration and intervention to improve.

Each risk is given a score based on likelihood x severity to give the risk rating. The likelihood refers to the possibility of harm against a benchmark throughout the industry and severity is the size or strength of impact on the workers, businesses, or on Hardscape, where each receives 1 - least risk to 5 - greatest risk. Any risk over 8 is of medium risk and requires investigation, mitigation, or corrective action. A risk rating of over 15 is regarded as high and needs immediate action with supply halted until remedial action can be taken to significantly reduce the risk of potential harm to workers.

One of our Key Performance Indicators is the number of medium and high-risk scores currently recorded. Our target is Zero High risk ratings and 5 medium risk ratings, but this will be progressively reduced as we further develop our supply chain management controls.

Modern Slavery Act & Ethical Trading Statement



We carry out thorough monitoring, auditing, and remediation measures with our supply chain, but this is all done with a spirit of support, guidance, and teamwork. Our approach has allowed for greater transparency, reduced fear of financial loss, and better outcomes for workers. During the audits and external verification, we review documentation, verify certifications, and interview employees, whilst looking out for key indicators such as abuse of vulnerability, restriction of movement, isolation, signs/reports of physical or sexual violence, intimidation, threats, or deception from the employer or employment agent. We also will review if there are signs of retention of identity documents, withholding of wages, debt bondage, abusive living conditions, or excessive overtime where any initial signs indicate that there may be a significant risk or some evidence of forced labour.

Examples of some of the positive interventions made are:

- Unannounced social and ethical audits carried out in India by local NGO, highlighting the lack of worker understanding of the ETI base codes, and lack of the message going beyond the supplier management. As a result of this intervention, the 9 base codes have been translated to Hindi and painted on a clearly visible wall where the workers can see it daily.
 - Engagement with a supplier following a workplace fatality, to offer support, flexibility, and help to reduce the pressure on the supplier, whilst helping put in place effective measures to prevent recurrence. This involved supporting the updating of their risk assessments using our own competent advisors to create effective templates and details to improve their systems, allowing their Health & Safety representative to focus on practical H & S developments and worker safety training.
- Creation of an ITF agreement matrix in collaboration with our freight forwarders, who gained an approved appreciation for the need for the agreements. This has led to several agreed actions being determined, which are currently being implemented to reduce the risk of slavery, exploitation, and unfair treatment to seafarers. Actions to mitigate risk in order of priority and severity include:
 - Add new vessels (& details) immediately to the list once they become known to us.
 - Send shipping agents ITF information, links, applications to persuade vessels without an agreement to get one.
 - Review lapses or terminations of agreements and advise if they can be reinstated or understand why they cannot.
 - Largest risk appears to be Chinese shipping. Get local information and further ITF data on how this can be managed better.
 - Remove vessels from the list that we do not use, which do not have an ITF agreement.
 - Request vessels without an ITF agreement are not used for Hardscape and put in place an ITF agreement only stipulation.
 - Review if alternative vessels can be used by delaying loading, and what impact that will have.
 - Liberia, Denmark, Hong Kong flags used with no agreement. Check national info and policies for weak areas and developments.
 - Review and benchmark if other agents are achieving a better % ITF agreement ratio. Investigate if we can improve by using their measures.

We are happy to report that no incidents of modern slavery have ever been identified within our business or supply chain. This does not mean that there have been no incidents, so we will continually strive to improve transparency, reduce risks, and ensure workers throughout the supply chain are protected.

Modern Slavery Act & Ethical Trading Statement



The simplicity of our supply chain allows us to have greater control over the management and understanding of the suppliers and their processes. We are fortunate that the nature of the work in the quarrying and stone manufacturing industry historically and presently seems to create long-term careers through a skilled trade in limited supply, with reduced staff turnover and agency use in comparison to other industries. There are some risks that are greater than other industries in comparison, such as:

- Increased Health & Safety risks, with heavy plant, dangerous machinery, and excessive manual handling.
- Remote location of some of the quarries and factories, reducing the likelihood of inspections from regulatory authorities, increasing the potential for overworking when workers are far from home, and difficulty and cost of access for audits.
- Minimal NGO or regulatory consideration due to low numbers of reports, but this leads to reduced transparency.
- Lack of established Workers Unions within the industry, reducing the on-site support availability or worker feedback opportunities.

If any worker is found to be a victim of Modern slavery or Ethical mistreatment, we will take action to support the victim in gaining financial compensation or remediation, referral to government agency, local authority, or NGO, whilst reviewing our own procedures, policies, audits, or employee and supplier training. We have advised our suppliers to advertise reporting apps for Modern Slavery, such as Unseen, which will allow anonymous reporting and advice to workers on how to spot the signs of Modern Slavery and Human Trafficking.

The more we integrate with the ETI and our peer members, the more we will be able to improve our monitoring and investigative processes, by gathering essential knowledge and insights from meetings, webinars, reports, training courses, networking events, e-learning, and shared experiences. This helps develop our own internal training tools, information, and presentations, which are reviewed at least annually. Where evidence or indicators of unethical practices, worker mistreatment, or Modern Slavery are found, we will develop our training to focus on these areas to prevent recurrence.

We have our own in-house CPD trainers to help deliver ethical awareness training, but we also use external training personnel, CPD courses, E-learning modules, and regular Ethical Trading publications where required for specific developments and projects. Most training is given on induction then annually refreshed thereafter, unless specific projects or schemes are to be introduced, where ad-hoc training is then implemented. We have a comprehensive training matrix, monitored by the HR Department, who ensure that all training is kept relevant and up to date for all employees. We also offer CPD training for suppliers, customers, or other stakeholders, to effect positive change throughout our supply chain and industry. We are members of the Supply Chain Sustainability School, which is a comprehensive and high-quality source of training tools and information that we use to improve our ethical knowledge and understanding.

Hardscape will continue to review, update, and publish its Modern Slavery Policy, Modern Slavery 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.

Alex Warren
Managing Director

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 have 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

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. Your report could mean somebody's freedom.

Google Play: www.play.google.com/store/apps/details?id=com.unseen.unseenApp

Apple Store: www.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/>

Hardscape Head Office:

Eagley House, Deakins Business Park
Egerton, Bolton, BL7 9RP

Tel: 01204 565 500
www.hardscape.co.uk