



# **HARDSCAPE**

## **GROUP**

# **Modern Slavery and Ethical Trading Policy and Report 2025**

### **Within this document:**

- Hardscape Group background and report scope
- Hardscape Group Modern Slavery & Ethical Procurement Policy
- Ethical Trading Initiative alignment
- Supply Chain, Map, and Risk analysis methodology
- Salient Risks and Actions
- Action, Remedy, and Continual Improvement
- Developments for 2025
- Information on how to spot and report suspected modern slavery (Unseen)

# Modern Slavery and Ethical Trading Policy and Report 2025

Hardscape Group Ltd, incorporating Hardscape Products Ltd & Hardscape 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. We use high performance, cost effective, and ethically sourced products including paving, setts, cladding, artwork, and street furniture using materials such as Granite, Sandstone, Limestone, Porphyry, and Slate or manufactured concrete and clay products which may contain metal or wooden accessories and detailing. Operating from offices throughout the UK, Hardscape Products has an extensive portfolio of supplying materials for prestigious hard landscaping schemes for urban, civic, public realm, commercial, and private projects. Hardscape 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 has 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 and support the eradication of Modern Slavery.

The British Standards Institution publication: **Organizational responses to modern slavery (BS 25700:2022)** provides organizations with guidance for managing modern slavery risk in its operations, supply chains and its wider operating environment. It uses a risk-based approach to help organizations understand the risk of modern slavery, to manage and reduce this risk as part of its legal and non-legal frameworks and go beyond its legal and statutory duties. This risk management involves the systematic application of policies, procedures and practices to the activities of communicating and consulting, establishing the context and assessing, responding, monitoring, reviewing, recording and reporting the risk of modern slavery. Hardscape fully supports this standard, and we align our policies, practices, and actions to this standard.

The **United Nations Sustainable Development Goals (UNSDGs)** are an urgent call for action by all countries - developed and developing - in a global partnership to provide a shared blueprint for peace and prosperity for people and the planet, now and into the future. They recognize that ending poverty and other deprivations must go together with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests. Hardscape is fully committed to improving sustainable development and strive to support the goals, especially where we can improve worker welfare, safety, equality, and sustainability.



# Modern Slavery and Ethical Trading Policy and Report 2025

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## Modern Slavery and Ethical Procurement 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 will always strive to ensure within its own business and supply chain the Freedom of Workers to Terminate Employment, Freedom of movement, and Freedom of association or collective bargaining. Hardscape will also ensure our business and supply chain will prohibit and protect workers from any threat of violence, harassment, 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 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 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 ensures Modern Slavery Act and Ethical Trading compliance through embedding Human Rights, Ethical Trade and Anti-Slavery Frameworks and Principles through 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.

Hardscape assesses all ethical and slavery risks throughout our supply chain, and we publish information about our salient risks, with current actions in place to mitigate or reduce those risks on the UK Government Modern Slavery Register. We carry out regular remote and documentation audits with our supply chain, as well as 3rd party or in-person announced or unannounced audits to ensure we have full visibility and appreciation for the risks of unethical practices, and confidence in our suppliers. All our suppliers must agree and sign our 2-way Supplier Code of Conduct which requires them to be aligned with our high standards of ethical practice and modern slavery awareness & prevention but also commits Hardscape to treating our suppliers fairly and ethically with mutual respect, minimal pressure, and financial fair play.

Our KPIs include a target of 100% of suppliers audited annually with Zero significant risks or ethical non-compliances. We also monitor the shipping and logistical operations, where we target confirmation of an International Transportworkers Federation (ITF) agreement or suitable National Rules conformance with 100% of transport vessels used to carry our materials.

We will publish details of how we will achieve Modern Slavery prevention and Ethical Procurement and show the results of our analysis of the previous year within our annual Modern Slavery & Ethical Trading Report.



Managing Director  
22nd May 2025

# Modern Slavery and Ethical Trading Policy and Report 2025

## Ethical Trade Initiative (ETI)

Hardscape aligns our policies, procedures, and practices with the Ethical Trading Initiative (ETI). The ETI is a leading alliance of trade unions, NGOs, and companies, working together to advance human rights in global supply chains. They convene and collaborate with key stakeholders to improve business transparency and accountability and bring about positive change. A critical friend, ETI provides practical solutions to end the abuse of human rights at work, to make workers' lives, and business, better.

Their vision is of a world of work that protects human rights, ensures dignity for all, provides opportunity and is free of exploitation and abuse. Their mission is to advocate for the most vulnerable workers, by harnessing the power of their diverse and growing membership.

Through collaboration and innovation, the ETI works to drive engagement, challenge barriers to change, and ensure respect for human rights at work. ETI members and supporters adopt the 9 Base Code Principles which are:



1. No forced labour.



5. Living wages are paid.



2. Freedom of association and the right to collective bargaining are respected.



6. Working hours are not excessive.



3. Safe and hygienic working conditions.



7. No discrimination is practiced.



8. Regular employment is provided.



4. Child labour shall not be used.



9. No harsh or inhumane treatment.

Hardscape has worked with the ETI to improve our understanding, management controls, and ethical procurement practices to ensure we minimise risk of unethical practices and modern slavery within our business and supply chain. This work has significantly improved workers' welfare, rights, and protection from harm.

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 creates long-term careers for skilled tradespersons. These skills are difficult to replicate, so temporary workers, unskilled labour, and agency use are uncommon. This has an added benefit of reduced staff turnover and high worker engagement compared to other industries, but some risks are greater 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 cost, difficulty, and therefore likelihood of inspections from regulatory authorities, increasing the potential for reduced due diligence.
- Minimal NGO or regulatory consideration due to low numbers of reports, but this leads to reduced reporting and transparency.
- Lack of established Workers Unions within the industry, reducing the on-site support or opportunities for collective bargaining, legal support, and worker advice.

# Modern Slavery and Ethical Trading Policy and Report 2025

## Supply Chain

We have long-standing relationships with many partners within 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.



## Hardscape Supply Chain Map

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.

We carry out comprehensive ethical risk analysis of each supplier's location, region, country, 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 the most recent data obtained from the:

- ITUC Global Rights Index Rating,
- ILO Occupational Deaths report,
- World Health Organisation (WHO) Health Estimate Report,
- The Global Slavery Index
- Human Freedom Index,
- International Labour Organisation (ILO) Occupational Fatality and Injury reports,
- The International Transportworkers Federation (ITF) status reports.

Our Ethical Risk Matrix is reviewed monthly. 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.

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.

Following corrective or preventative action, the Risk level is re-evaluated to reduce the scoring, if applicable.

The main salient risks are published on the Government Modern Slavery Register to demonstrate transparency, hold the business to account, and drive us to find ways to continually improve our management controls to improve welfare for workers in our supply chain.

# Modern Slavery and Ethical Trading Policy and Report 2025

## Salient Risks & Actions

Our current salient risks identified are:

**RISK:** Ensuring that working conditions are safe and hygienic. The high level of manufacturing and construction industry incidents resulting in fatalities in the UK is a major concern. 2023-2024 - Construction: 51, Manufacturing: 16.

**ACTION:** We have made significant improvements to our Risk Assessment and Method Statements (RAMS) supplied to clients and principal contractors prior to working on sites. We have analyzed each risk in greater detail using the latest industry advice to support this. We also go to greater lengths to obtain bespoke and dynamic site details, ensuring the RAMS are specific to each site and fit for purpose, whilst remaining easy to read, understand, and follow.

**RISK:** 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).

**ACTION:** Unannounced social and ethical audits carried out in India by local NGO who understands the specific risks, needs, and issues experienced by the stone industry or Rajasthan. As a result, the 9 ETI base codes have been translated to Hindi and painted on a main wall where the workers can see it daily.

**RISK:** 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). Communication difficulties when auditing and sharing information due to cultural norms and language barriers. Ensuring that no harsh or inhuman treatment is allowed. Due to the travel distance and the location of quarries being predominantly rural and difficult to access, direct or regular contact with workers to ascertain if abuse occurs in remote locations is more difficult.

**ACTION:** Greater remote auditing scrutiny done, with photos and videos done more frequently and with the direction of the auditor for where to review and point the focus. We are currently consulting with a 3<sup>rd</sup> party auditor to help support the language barriers, cultural differences, and be more respectful of local norms and customs.

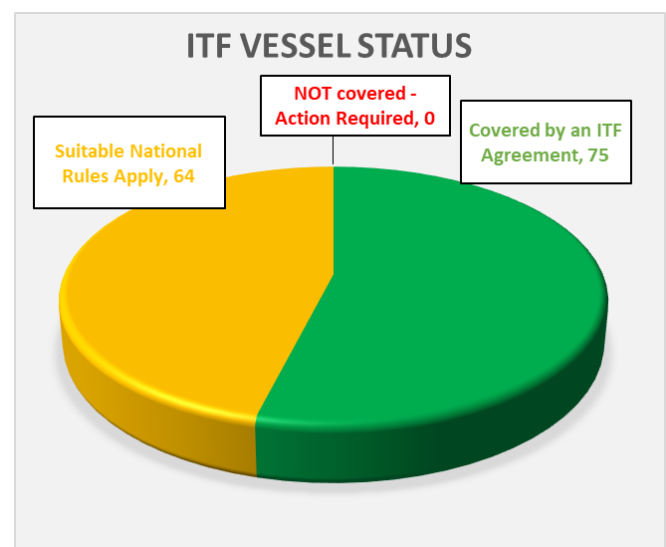
**RISK:** Freight shipping from Asia to the UK. High likelihood of Flags of Convenience or lack of ITF agreements. Lack of freight management controls, audit capability, and understanding of the risks by suppliers.

**ACTION:** Development of a Vessel ITF matrix in collaboration with our freight forwarders and logistical teams. This has been reviewed monthly to ensure we have the most recent data on vessels used and their ITF status. New vessels are added to the list once they become known to us. Existing vessels without an agreement due to lapses or terminations are required to advise if they can be reinstated or understand why they cannot. We will remove vessels from our approved list that do not have an ITF agreement or suitable national rules applied, and who do not make efforts to remedy this.

If necessary, we delay loading and review if alternative vessels can be used by, and what impact that will have. Our freight forwarders are now more experienced understanding these requirements and applying these to other businesses, not just ours.

Our current ITF agreement status KPIs are as follows:

ITF Status	Number of vessels	%
Covered by an ITF Agreement	75	54%
Suitable National Rules Apply	64	46%
NOT covered - Action Required	0	0%
<b>Total</b>	<b>139</b>	





# Modern Slavery and Ethical Trading Policy and Report 2025

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## Action, Remedy & Continual Improvement

If any worker is found to be a victim of Modern slavery or Ethical mistreatment, we will refer this to an appropriate government agency, local authority, or NGO to ensure the correct legal action is taken.

Following this, we will act on any recommendations or advice from the authorities whilst reviewing our own procedures, policies, audits, or employee and supplier training.

We will take immediate and decisive action to support the victim in gaining protection from further harm, financial compensation, or remediation.

We will support our own workers where they may require time off to make sufficient arrangements to allow them to break free of their circumstances that have led to modern slavery.

We will also ensure our supply chain partners follow these same steps to ensure the victims are given priority over all measures to ensure they are protected and secure.

We have advised our suppliers to promote reporting apps for Modern Slavery, such as Unseen, which will allow anonymous reporting and advise workers on how to spot the signs of Modern Slavery and Human Trafficking.

We will continue to research best practices and modern management guidance to improve our monitoring and investigative processes, by gathering essential knowledge and insights from meetings, webinars, reports, training courses, networking events, e-learning, and peer shared experiences. This helps develop our own internal training tools, information, and presentations, which are reviewed at least annually.

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.

We offer CPD training for suppliers, customers, or other stakeholders, to drive positive changes throughout our clients, supply chain, and wider 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.

## Developments Planned for 2025

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.
- Further improve and simplify the wording of the Supplier Code of Conduct to support suppliers with different languages to include supporting data ensuring any links have pages available with language selection capabilities.
- Carry out new style 2-way audits with all suppliers at least once by end of 2025. 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.

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> May 2025

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](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. Your report could mean somebody's freedom.

Google Play: [www.play.google.com/store/apps/details?id=com.unseen.unseenApp](https://www.play.google.com/store/apps/details?id=com.unseen.unseenApp)

Apple Store: [www.apps.apple.com/gb/app/unseen/id1401303554](https://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/>

#### 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.

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