



## **MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

### **SUPPLY CHAINS**

Our supply chains include the sourcing of raw materials principally related to the provision of natural stone products.

### **POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

### **DUE DILIGENCE PROCESS FOR MODERN SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk, HND (UK) Ltd are committed to ensuring:

- Where possible, we build long standing relationships with suppliers and stakeholders and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point of contact is preferably with a UK company, branch or representative and we expect these entities to have suitable modern slavery and human trafficking policies and processes.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

### **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to modern slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. The Directors are responsible for compliance with respect to their supplier relationships.



## **TRAINING**

To ensure a high level of understanding of the risk of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors and Production Manager have been briefed on the subject and it is discussed in management to raise awareness and reviewed annually.

## **OUR EFFECTIVENESS IN COMBATTING MODERN SLAVERY AND HUMAN TRAFFICKING**

We use the following key performance indicators (KPI's) to measure how effective we have been to ensure that modern slavery and human trafficking is not taking place in any part of our business or supply chains;

- Annual reviews at management meetings
- Use of labour monitoring and payroll systems
- Communication and personal contact with our own staff at induction
- Communication and personal contact with the supply chain and their understanding of, and compliance with, our expectations in line with this Policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes HND (UK) Ltd's Modern Slavery and Human Trafficking statement.

A handwritten signature in black ink, appearing to read 'Nick Dawson', written over a dotted line.

**Nick Dawson, Managing Director**

**July 2019**