| HR-001 Modern Slavery Policy Statement | H&S Documents | Reviewed July 2025 |
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Modern Slavery Statement

A) ORGANISATION

This statement applies to Hardy Signs Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year – April 2021-March 2023

B) ORGANISATIONAL STRUCTURE

Hardy Signs operates from one single centralised location from which all employees work. The organisation is controlled by a board of Directors, led by the Managing Director.

Organisation Address:

Hardy Place, 10-11 The Maltsters, Wetmore Road, Burton on Trent, Staffordshire, DE14 1LS.

The primary activity carried out by the organisation is the design, manufacture and installation of signage and display products. The requirement for these services is not seasonal, and is high at all times throughout the year.

The labour supplied to the organisation in pursuance of its operation is carried out wholly in locations across Great Britain.

C) DEFINITIONS

The organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking.

The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

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E) SUPPLY CHAINS

In order to fulfil its activities, the Organisation's main supply chains include those related to the supply of signage materials and goods from various suppliers in the United Kingdom We understand that the Organisation first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

F) POTENTIAL EXPOSURE

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in its extended supply chains because they could potentially involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

F) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, the Organisation remains in a position to publish its statement for the financial year 2019/2020 in line with the original publishing requirements.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above. The organisation's use of suppliers dropped significantly due to the fact that homeworking was swiftly implemented in March 2020 which meant that its premises, from which it usually conducts day to day business, were temporarily closed. Several of our workforce were placed on furlough as a result of the drop in demand for our services, meaning there were no additional temporary labour needs.

During the pandemic, the organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

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F) STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- measures in place to identify and assess the potential risks in its supply chains;
- undertaking impact assessments of its services upon potential instances of slavery;
- any actions taken to embed a zero-tolerance policy towards modern slavery;

G) KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

The organisation carries out an annual review of all aspects within this statement. This
includes review of suppliers, allocating approved supplier status where applicable.
Reviews include the assessment of potential exposure and impact of other factors such
as Covid-19. Annual review processes are recorded within the Organisation's Business
Manual.

G) POLICIES

The Organisation has the following policies which further define its stance on modern slavery. Corporate Social Responsibility Policy Supplier Code Of Conduct Recruitment Policy

H) TRAINING

The Organisation provides the following training to staff to effectively implement its stance on modern slavery.

Induction Training.

I) SLAVERY COMPLIANCE OFFICER

The Organisation names its General Manager as Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation obligations in this regard.

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This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Approved by

Nik Hardy

Managing Director

10th July 2025