

Hinton Perry & Davenhill, manufacturer of Dreadnought Tiles and Ketley Bricks sets out to have a positive impact on the working conditions of those working directly or indirectly for our business and minimize any negative impact we might have through our actions and those of our suppliers.

Modern slavery is a crime and a violation of fundamental human rights. We work to ensure that our employees and suppliers share our vision of fair and safe working conditions.

Hinton Perry & Davenhill has a zero-tolerance approach to modern slavery both within the Company and within its supply chain. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. This covers all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. We have reviewed our existing compliance and risk management processes following the introduction of the Modern Slavery Act 2015 The Code of Conduct.

Actions to report modern slavery or human trafficking. Employees are encouraged to raise any concerns about suspected modern slavery associated with the Company or our suppliers and report this to Company Directors. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery in whatever form is or may be taking place in any part of our own business or in our supplychains.

### **Prevention of modern slavery**

We are committed to ensuring the highest employment standards operate in our own business. We expect the same high standards from all of our contractors, suppliers and other business partners, we recognise our obligation to ensure that modern slavery and human trafficking does not take place in our supply chains. Where possible we build long-lasting relationships with suppliers and make clear our expectations of business behaviour.

Our minimum requirements for our business and suppliers consistent with the Modern Slavery Act 2015 are set out below, however we aim to hold all to the highest employment standards and expect these standards to materially exceed the requirements set out:

#### **1. Child labour**

Child labour must not be used. A child is defined as any person under the age at which the local minimum age law stipulates for work or mandatory schooling.

#### **2. Slavery, forced, bonded\* or involuntary labour**

(\* bonded labour, e.g. a person becomes a bonded labourer when their labour is demanded as a means of repayment for a loan) There must not be any slavery, forced, bonded or involuntary labour in use across any part of the operation. Workers should have the legal right to work at the

premises, to leave the premises at the end of their working day and the freedom to terminate employment at any time in accordance with the agreed notice period.

### 3. Human trafficking

There must not be any labour who could be considered to have been subject to Human Trafficking. Workers cannot be recruited through a person who arranges or facilitates the travel of another person. It is irrelevant whether that person has consented to travel.

### 4. Health and safety hazards

Workers must be prevented from exposure to any health and safety hazards that are likely to pose an immediate risk of causing death, permanent injury or illness.

### 5. Working hours

A reliable system for recording working hours and wages for each individual is in place in our operations and the same is asked of suppliers.

### 6. Business ethics

There must not be any form of bribery offered or used in relation to the business undertaken by Hinton Perry & Davenhill

#### Breaches of this policy

Any employee or supplier who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy and do not rapidly remedy any breaches.

#### Responsibility for the policy

The board of Hinton Perry & Davenhill have overall responsibility for ensuring this policy complies with our legal and ethical obligations and that the policy is complied with by those it relates to. Responsibility rests with us all to deliver the required approach to prevent modern slavery within our business and also within our supply chain.

For and on behalf of Hinton Perry & Davenhill Ltd



Kevin Preston  
Managing Director

31<sup>st</sup> January 2025

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