

**MODERN  
SLAVERY ACT  
STATEMENT**

## Modern Slavery Act Statement

Hythe Engineering Limited (“Hythe Engineering Limited” or “the Company”) is committed to preventing slavery and human trafficking in its corporate activities and in its supply chain. This statement sets out the Company's actions to assess potential modern slavery risks related to its business and the adoption of processes to minimise any risk of slavery or human trafficking in the Company's business and supply chain.

As an equal opportunities' employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

Our supplier and contractor onboarding process requires the completion of a questionnaire in relation to cooperate social responsibility, slavery, and human trafficking. We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

### **Relevant policies**

We are committed to conducting our dealings, whether with customers, suppliers, employees or the communities in which they are based, with the utmost integrity. To achieve this aim, Hythe Engineering Limited operates the following policies that include its approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in its operations:

#### **1. Code of Conduct**

Hythe Engineering Limited's Code of Conduct is reviewed on a regular basis and provides a clear framework of principles and guidance that sets out standards of ethical behaviour we expect from all employees and the people that work with us. This includes treating everyone fairly and respecting human rights.

All employees and new starters are made aware of where they can access a copy of the code of conduct. All new starters carry out compulsory online e – learning covering the code of

conduct via our LMS platform, Brain Box and are issued a letter to confirm they have read and understood our policies and procedures. Employees are required to complete this e – learning annually to ensure up to date understanding of the code of conduct along with Control Self Assessments, encompassing questions related to the code of conduct.

## 2. Whistle Blowing Policy

Hythe Engineering Limited's Whistle Blowing policy encourages and enables all its employees, customers and other business partners to report any ethical concerns they may have concerning the direct activities of, or the supply chains of Hythe Engineering Limited. This includes any circumstances that may give rise to the risk of slavery or human trafficking. Hythe Engineering Limited will not tolerate the harassment or victimisation of a person reporting corporate misconduct in good faith. In addition to the legal protection provided to such persons, Hythe Engineering Limited will treat retaliation against a person reporting corporate misconduct as a violation of the policy and a serious disciplinary offence.

All reports of suspected unethical or illegal corporate conduct are independently investigated and tracked from inception to resolution and, where necessary, actions are taken to rectify any weakness in the systems that have been identified. If the employee is not satisfied with the explanation or outcome, they may raise the matter with Human Resources or the appropriate official organisation or regulatory body.

## 3. Anti-Harassment and Bullying Policy

Our Anti-Harassment and Bullying Policy affirms our commitment to a safe and respectful workplace, free from harassment, victimisation, or bullying of any form, as outlined in the Equality Act 2010. We strictly prohibit any conduct that demeans or intimidates based on age, disability, gender, race, religion, or other protected characteristics. All employees are expected to maintain professional conduct, with breaches potentially leading to disciplinary action. We support employees who experience harassment through both informal and formal complaint procedures and will take appropriate steps, including investigation and remedial action, to address all complaints promptly and confidentially.

## 4. Disciplinary and Grievance Policy

In line with our commitment to fair and equitable treatment of all employees, our disciplinary procedure aims to support employees in improving performance and resolving concerns. The process begins with informal support and, if necessary, progresses to formal disciplinary steps. Employees are given the opportunity to present their perspective, be accompanied in

meetings, and appeal any disciplinary actions taken. In cases of gross misconduct, immediate disciplinary action may be taken. Our grievance procedure similarly ensures employees can address work-related concerns in a respectful and structured way, supporting resolution through staged escalation when needed.

The grievance policy provides employees with a structured process to raise and resolve workplace concerns. While informal discussions with managers are encouraged, employees may pursue a formal procedure if issues remain unresolved. This policy is designed to promote open communication and fairness, allowing grievances to be addressed through escalating stages. Employees have the right to be accompanied during meetings and will receive decisions within set timelines. The Company commits to ensuring grievances are addressed without detriment to the employee, though malicious complaints may lead to disciplinary action. This policy aligns with the ACAS Code of Practice on Disciplinary and Grievance Procedures.

## Governance and Board Approval

This statement is made in accordance with section 54 (1) of the Modern Slavery Act 2015 and is applicable to all Hythe Engineering Limited group companies. Overall responsibility for modern slavery sits with our Senior Leadership, and our Modern Slavery Statement is approved by our Managing Director.