

## Modern Slavery Statement – 2023



This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Hayley Group Ltd and its subsidiaries Bearing Man Limited (BML Hayley), Advanced Maintenance Supplies and Mercury Bearings has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Hayley Group Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our business

Hayley Group Ltd and its subsidiaries Bearing Man Limited, Advanced Maintenance Supplies and Mercury Ltd are owned by Hayley Group Holdings Limited.

We are an MRO and engineering inventory supplier of bearings, seals, transmission, fasteners, fluid power, adhesives, drives & motors, lubricants, PPE & janitorial, vending solutions and other associated products operating in the United Kingdom.

### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Modern Slavery Act Policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals
4. Corporate Social Responsibility Statement. This statement explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### Our suppliers

Hayley Group Ltd operates a supplier policy and maintains a supplier approval list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. We have over 3000 live suppliers at any one time and we source from all regions of the world. We are rolling out our Modern Slavery questionnaire and a Supply Chain Risk Assessment and have partnered with Avetta to help us achieve this. We expect to have

1000 of the suppliers to be signed up and completed by the end of our financial year (December 2024).

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

### Training

To ensure our procurement/buying teams and HR staff understand the risks of modern slavery they are given training by receiving this statement and the Modern Slavery Policy.

Hayley Group Ltd provides guidance on how concerns can be communicated on a confidential basis. Concerns about suspected modern slavery associated with the Group or our suppliers may be reported by employees in this manner.

### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

### Approval for this statement

Signed *Ben Noakes* Managing Director Date 11 / 06 / 2023

Signed *Gary Quinlan* Managing Director Date 22 / 05 / 2023