



# Modern Slavery and Human Trafficking Statement 2024

## **1. Introduction:**

In accordance with our Values and our Code of Ethics, Hexadex Group is committed to trade ethically, source responsibly and take a transparent and robust approach to prevent Modern Slavery and Human Trafficking throughout our businesses and in our supply chain.

We make this statement pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31<sup>st</sup> December 2024 to highlight the key activities we have undertaken during the year to combat Modern Slavery and Human Trafficking.

## **2. Our Organisation Structure, Business and Supply Chains**

Hexadex Group consists of the companies listed in the table below.

**Headcount** as of 31<sup>st</sup> December 2024 is as follows:

Company	Full time employees	Agency
Hexadex Ltd.	25	0
Eminox Ltd.	240	15
SaveGuard LLC	60	0
Eminox Slovakia s.r.o.	36	0
Teconnex Ltd. (including Bellows Technology Ltd.*)	381	26
Teconnex Europe SRL	197	0
Teconnex Mexico S de R.L. de C.V.	234	0
Teconnex India Private Limited	48	103
Ceramex Ltd.	45	0
CWM Automation Ltd.	28	0

\*Bellows Technology Ltd has ceased trading and is no longer a separate entity as of November 2024. Employees previously employed by Bellows Technology Ltd are now employed by Teconnex Ltd).

N.B. Eminox PTE Ltd has ceased trading as of 31 December 2024.

Our group consolidated turnover in 2024 was £164 million.

### **What we do:**

- Design, manufacture and service OE and retrofit exhaust after treatment systems to meet specific customer and legislative requirements in the marine, power generation, construction, on-road rail and general automotive industries.
- Design and manufacture specialist acoustic and thermal insulation products for the automotive and industrial markets.
- Design and manufacture of catalyst filled containers.
- Manufacture purpose designed clamps and industrial couplings.
- Design, manufacture and supply metallic expansion joints and bellows assemblies including metallic and PTFE hose assemblies, fabric compensators and other precision engineering products.
- Assemble lithium-ion battery packs for leisure and domestic energy storage.
- Design, manufacture and installation of special purpose machinery, including installation, testing, commissioning and servicing.
- Provide cleaning systems and remanufacturing services for diesel particulate filters, including the replacement and repair of components and restoration through surface treatment.

- Design, manufacture and installation of food/packaging machinery and control systems, including installation, testing, commissioning and servicing.
- Own Real Estate.

### **Where we operate:**

We operate manufacturing sites in the UK, Romania, India, Mexico, Slovakia, USA and have joint venture partners in China, India, Japan and the USA.

### **Our Supply Chain:**

Our supply chains are global with raw material and components sourced from the Middle East, Africa, Asia, USA, in addition to the EU and EFTA countries.

## **3. Policies**

We have specific policies in place to protect against Modern Slavery or Human Trafficking in our supply chains or in any part of our business. These include our Code of Ethics, Anti-Slavery and Human Trafficking Policy, Supplier Code of Conduct and Whistleblowing Policy. We periodically review and update all our policies to ensure best practice and compliance with any legislative and business changes.

## **4. Due Diligence**

We continue to monitor and maintain our external whistleblowing hotline, now in its fourth full year of operation, which operates alongside our external advice line. The whistleblowing service is available in the local language applicable to all our wholly owned operating companies. We continue to use our regular communication channels to remind employees of its existence and create an environment in which any employee or supplier may feel confident that any report (not just about Modern Slavery) is treated confidentially, if they so wish, is without threat of retaliation and is taken seriously.

Our trading terms and conditions include a right of audit for some subsidiaries to physically inspect suppliers and place a contractual condition on suppliers to comply with all applicable policies on Modern Slavery and Human Trafficking. The terms and conditions also contain a formal obligation to comply with our mandatory policies, one of which is our Anti-Slavery and Human Trafficking policy.

Our core training program includes a requirement for all current and new employees throughout the Hexadex Group to complete e-Learning courses that include the Hexadex Group Code of Ethics and Modern Slavery Awareness. Training is refreshed on a 3-year cycle or at legislation/policy change.

## **5. Risk Assessment and Management**

### **Risks**

Hexadex Group has identified the following as our top three risks to the business and the supply chain:

- Use of agency temporary staff and recruitment of permanent staff.
- Presence in Mexico, Asia and Eastern Europe.
- Tertiary suppliers including SMEs, overseas and online suppliers.

### **Managing Risks**

Hexadex Group takes the following steps to manage the risks of slavery and human trafficking in our business and our supply chain:

**People:**

- Right to work checking process formulated at all businesses within Hexadex Group and embedded into detailed recruitment processes. This includes confirming bank accounts for payment of salaries, address duplication and next of kin. In addition, any changes made to an employee's bank account details during their employment are physically verified.
- Verification of the credentials and qualifications of job candidates to ensure they are legitimate and accurate. This can involve conducting background checks, verifying employment history, educational qualifications and checking references.
- Monitoring mechanisms for recruitment agencies to oversee the recruitment process and ensure compliance with company policies and legal requirements. This includes conducting regular audits of recruitment practices, reviewing documentation related to recruitment activities and conducting site visits.

**Supply Chain:**

- Risk based analysis of the supply chain to identify suppliers that are at higher risk of Modern Slavery and Human Trafficking (based on factors such as geography, industry, business size and demographic) permitting a tier-based approach to due diligence.
- Supplier approval processes include an assessment of risk and of the supplier's procedures and processes to prevent Modern Slavery.
- Suppliers sign up in agreement to comply with the Supplier Code of Conduct and complete a questionnaire confirming if the organisation is required to comply with the Modern Slavery Act 2015 and if not, the organisation is asked what it does to prevent Modern Slavery.
- Suppliers are subject to third party audits (prioritised by risk category).

**Collaboration:**

Organisations we collaborate with or to which we subscribe to reduce the risk and help us if any case is identified are:

- **Slave Free Alliance (SFA)** – supporting independent reviews, training and consultancy in areas such as supply chain activities.
- **NAVEX** – operating a confidential whistleblowing hotline and support services.
- **Protect** – providing confidential advice to employees and associates regarding whistleblowing as well as training for handling whistleblowing cases.
- **Safecall** - providing investigations and interviewer training for report managers.
- **West Yorkshire Anti-Slavery Partnership** – supporting organisations in West Yorkshire (Teconnex) who may encounter incidents or matters involving modern slavery or human trafficking and exploitation.

**Additional Steps:**

Actions taken by our subsidiaries during 2024:

- Eminox and Ceramex, following a Slave Free Alliance (SFA) independent report, have made further improvements to its new supplier questionnaires, ensuring that the Supplier Code of Conduct is communicated to all new suppliers. Labour providers have been audited against a Modern Slavery best practice framework. A further review of processes and policies and updated gap analysis is planned to be completed by Eminox in the first half of 2025 to refresh actions following the recent SaveGuard acquisition and the revision of the Eminox Group business structure.
- Teconnex continues to ensure that all new suppliers to the business have been through the 'new supplier approval process' which requires the suppliers to sign up to the supplier code of conduct and share the related modern slavery policies or statements the supplier has in place. Teconnex has conducted a groupwide review to ensure the process is being carried out consistently. Teconnex engaged an independent audit company to audit one of its suppliers (identified through risk assessment as a potentially elevated risk of Modern Slavery). The outcome of the audit was successful and helped to identify improvements to be made by the audited supplier.

- Hexadex has revised and reissued the group policies, including a specific policy to address the escalation and remediation of Modern Slavery and Human Trafficking, should any potential incident be identified or be disclosed. Hexadex continues to collaborate with each of the subsidiary companies to further develop our policies aligned to our ESG (Environmental, Social & Governance) roadmap. Our ESG roadmap encompasses climate change, human rights and adherence to laws aligned to the applicable sustainable development goals of the United Nations.

## **6. Training**

During 2024 a new Learning Management System was implemented for the Hexadex Group. This includes enhanced eLearning resources in ethics, compliance and Modern Slavery awareness. Training that we require to be completed is:

- All employees must complete a Code of Ethics eLearning module.
- All employees must complete a Modern Slavery Awareness eLearning module.
- Training is refreshed on a 3-year cycle or at legislation/policy change; the content and frequency will be reviewed during 2025.

We have collaborated with the Slave Free Alliance (SFA) to deliver Modern Slavery and Human Trafficking Awareness training to our executive and senior leaders. We are currently collaborating with the SFA on improving best practice including further bespoke training for key areas of the business such as supply chain and HR.

During 2025 we will review our cohort of Whistleblowing Officers and refresh training in the handling of whistleblowing concerns.

## **7. Monitoring Our Effectiveness**

The following KPIs continue to be developed and used to monitor progress:

- Monitoring the % of employees in the Hexadex Group who have completed the mandatory e-learning modules. Our target for 2025 is that more than 95% of employees will have completed these modules.
- Monitoring of the % of suppliers who have signed up to the Supplier Code of Conduct.
- Monitoring of any incidents, disclosures or cases of Modern Slavery or Human Trafficking within our business or supply chain.

## 8. Approval

This statement has been approved by the Hexadex Group Board of Directors and signed on behalf of the Board pursuant to delegated authority to do so by its Chairman, William David Milles.

Signed by:

Signed by:  
  
.....  
**W D Milles**  
**Executive Chairman**  
**Hexadex Ltd.**

Date: 30-Apr-2025

This statement is also approved by each subsidiary Board of Directors and signed by the Managing Director on their behalf.

Signed by:

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.....  
**M G Williams**  
**Managing Director**  
**CWM Automation Ltd**

Date: 30-Apr-2025

Signed by:  
  
.....  
**J D Griffith**  
**Managing Director**  
**Eminox Ltd and Ceramex Ltd**

Date: 30-Apr-2025

Signed by:  
  
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**C P Marsden**  
**Managing Director**  
**Teconnex Ltd**

Date: 30-Apr-2025