



Hawksley and Sons Ltd
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Director
Maurice Gale
Established 1869
Reg. No. 1503795

Human Trafficking & Modern Slavery Statement

Hawksley & Sons Ltd.

Hawksley & Sons work from the principle that everything we do should aim at improving the quality of life for all our stakeholders. Whether this is manufacturing quality medical equipment that enables our customers to save more lives or ensuring that we maintain ethical business practices that mitigate suffering.

Hawksley's small but extremely dedicated group of employees all want to address these issues and implement robust strategies to make sure that Hawksley and its suppliers are united against the risks of modern slavery and human trafficking.

Due Diligence & Supply Chains

- In order to assess the risk of modern slavery in its Supply Chain, Hawksley & Sons carries out comprehensive risk assessments for all of its suppliers, which we support with audits that are carried out on our supplier's production sites.
- During supplier assessments, we score existing and potential suppliers on a matrix designed to assess their existing practices and competency for adhering to their practices, which includes and makes modern slavery issues central. During our initial or ongoing audits, we verify that the information provided to us is correct and improved upon.
- Our long-term goal is twofold. We want to extend our materials mapping from outside of our own production, to also encompass our suppliers. Which means understanding exactly where every component of our supplies come from, from primary materials to its delivery to the customer. There is a desire for suppliers to adopt Hawksley's values of improving lives, which can be achieved by continuing an honest, open and valued distributor for our suppliers, in order to help our suppliers recognise that Hawksley equally have demands for integrity, honesty and a commitment to a better world.

Child Labour, Forced and Under-paid labour, and Human Trafficking

- Hawksley & Sons will not work with any supplier that employs, or has had a history of employing, under-age labour, forced-labour, or under-paid labour as described in the





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Minimum Age Convention 138, Worst Forms of Child Labour Convention 182, Article 2 of the Forced Labour Convention 29, and Article 1 of the Abolition of Forced Labour Convention 105.

- We adhere to the terms set out in the California Transparency in Supply Chains Act (2010), California Civil Code (section 1714.43) and the UK Modern Slavery Act (2015).
- Hawksley does not tolerate any form of slavery and trafficking and will act quickly and forcefully if practices violating the aforementioned acts are encountered. Ensuring appropriate steps are taken to identify and tackle any forms of modern slavery.
- If any member of staff is found to breach this policy, appropriate measures will be taken.

The Risks of our Industry

- We consider our industry to face many risks of modern slavery. Our supply chain is strained by increasing demands for improved quality from above and cost-savings from below. This pressure increases the chances of manufacturers using no or low wage workers to exploit and be competitive in the market.
- The areas of our business that are highest risk of malpractice are for cheap and common consumables that need to be manufactured at low costs to be competitive in the marketplace. Lab plasticware and some lab glassware are these key risk areas.
- Geographical, we associated higher risk areas to be our suppliers in India, China, and South-East Asia.
- Hawksley sets a preference for national or European suppliers, for three reasons. Firstly, the various regulatory bodies that cover the European Economic Area make it harder for manufacturers to adopt and maintain working practices that are against the principles of equality and freedom from slavery. Secondly, to reduce our impact on the environment. But lastly and importantly, we have far more opportunities to audit and maintain close relationships with our suppliers at this distance.
- The Unknowns: perhaps the biggest risk of our industry comes from a lack of knowledge. Suppliers not knowing where a material was sourced, or who manufactured a premade component opens the door for potentially huge risks of modern slavery exploitation. This is why comprehensive mapping of our supply chain, from the raw material to the end user is critical to eradicating modern slavery once and for all.





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Our Role

To empower our organisation, our customers and our staff, we realise there are concrete measures we need to take in order to achieve our modern slavery targets.

- **Training:** Hawksley staff receive regular training on the signs of modern slavery and inequality. This is conducted from materials owned by the Federation of Small Businesses, and also developed by our Diversity, Equalities, and Inclusion Officer.
- **Collaboration:** We understand that other organisations may not share our values and place such high importance on modern slavery issues. When this is the case, we aim to work with our suppliers to help them understand why this is critical to both Hawksley and our customers (The NHS and other Public Bodies) long-term objectives. By building strong relationships and using the leverage of our productive sales channels, we help our suppliers make the necessary changes internally.
- **Commitment:** Although we want to support our suppliers to make progressive steps, if we continually identify them not progressing with their supply chain mapping, have concerns with their behaviour, we will actively seek new suppliers if they behave in a way that does not meet our expectations for safe workplaces.

Future Aims

- Hawksley & Sons will continue to be committed to ensuring that there is no place for modern slavery and human trafficking at any echelon of our organisation.
- Hawksley commits to a fully mapped supply chain for tier 1 and tier 2 suppliers by 2027
- We will ensure that we integrate the best current practices, work with our supply chain partners and become increasingly rigorous in our due diligence processes.
- The policy is to be reviewed annually to assess and refine to follow best practice.



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Support

If you believe you are a victim of human trafficking or modern slavery, please contact:

Modern Slavery Helpline: 080 0012 1700

(Open 24 hours a day, 365 days a year)

[Report Modern Slavery Online](#)

Victim Support Helpline: 080 8168 9111

[Victim Support website](#)

Signed:

Maurice William Gale (Director)