



Modern Slavery and Human Trafficking Statement

Structure, Business and supply chains

Hexadex Ltd is an English holding company with wholly owned subsidiaries operating principally in automotive related industries but also in automation and general fabrication. There are also joint venture arrangements in China, Japan and the USA. The company financial year end is 31 December.

At time of writing turnover in 2020 is forecast to be circa £122M.

The wholly owned subsidiaries operate in Romania India and Mexico as well as England.

Most of our customers are either based in Europe or have a European parent with high standards of due diligence throughout their supply chains.

The English subsidiaries are

- Teconnex Ltd (including its own subsidiary, Bellows Technology Ltd)
- Eminox Ltd
- Eminox New Ventures Limited
- Ceramex Ltd
- Hooton Engineering Ltd
- CWM Automation Limited

Active overseas wholly owned entities are

- Teconnex Europe SRL
- Teconnex India LLP
- Teconnex Mexico S de.RL de CV

Joint ventures are

- Teconnex Funwick Precision Technology (Kunshan) Co Limited
- Eminox Exhaust Control System (Kunshan) Limited
- Retrus Ceramex KK
- Ceramex North America LLC

Policy on slavery and human trafficking

We will work with others more used to dealing with human trafficking to ensure, insofar as possible, that there is no modern slavery in our supply chains or those of our customers and to eradicate it generally. We are committed to ensuring there is no modern slavery or human trafficking in our supply chain.

Our supply chain

Our supply chains predominantly originate in Europe, where raw materials and proprietary components are purchased from suppliers of repute. Our supplier evaluation procedure requires audit and approval of potential new suppliers before purchases are made.

Due diligence, assessment of risk and measurement of effectiveness

Modern Slavery exists in the same murky world as bribery and corruption., so we have partnered with others more versed in that world to conduct risk and gap analysis. We are a founder member of Slave Free Alliance who have helped us devise a programme, beginning with training and then workshops, to identify areas of risk. The training for MDs and senior members of staff in all English companies took place in February 2020 but the planned workshops were delayed by the onset of Covid-19; the first has only latterly taken place in Teconnex Ltd. At time of writing feedback is awaited, but we will act upon the findings during 2021. Teconnex Ltd has also made preliminary contact with West Yorkshire police.

CWM Automation Limited subjected itself to the Home Office Modern Slavery self-assessment online tool and, once feedback is received from the Teconnex Limited workshop, we will combine our learning from both exercises to formulate a risk assessment tool for use in all our operations.

Similar steps have been taken (in conjunction with KPMG) to analyse risk of bribery and corruption. A whistleblowing telephone report line will be introduced shortly to complement our existing whistleblowing advice line.

Staff training

As intimated above, training was procured from Slave Free Alliance for senior members of staff at the beginning of 2020. TV based training is being examined and will likely be rolled out to all staff during 2021.



WILL MILLES
Executive Chairman
Hexadex Ltd

Approved and adopted by the Hexadex Group Board
10th December 2020