HY-TEN

Hy-Ten Policy Manual

2026

Hy-Ten Policy Manual

- General Statement of Health and Safety Policy
- Quality and Environmental Policy Statement
- Local Community Policy
- Employment & Skills Policy
- Gender Pay Gap Report
- Greenhouse Gas Emissions & Waste Water Policy
- Responsible Sourcing & Sustainability Statement
- General Waste Policy
- Mental Health Policy Statement
- Resource Use Policy
- Equality & Diversity Policy
- Whistle Blowing Policy
- Transport Policy
- Anti-Slavery & Human Trafficking Policy
- Modern Slavery Act Statement
- Code of Conduct and Ethical Purchasing
- Anti-Bribery & Corruption Policy

General Statement of Health and Safety Policy

It is our Policy to ensure, so far as is reasonably practicable, the safety of all employees and any other persons who may be directly affected by the activities of the Company.

Hy-Ten Limited will as far as is reasonably practicable:

1. Aim to achieve compliance with legal requirements through good occupational health and safety performance
2. Provide adequate resources to implement this policy
3. Establish and maintain a safe and healthy working environment
4. Ensure that significant risks arising from work activities under our control are eliminated or adequately controlled
5. Develop and implement appropriate occupational health and safety procedures, and safe working practices
6. Include the management of health and safety as a specific responsibility of managers at all levels
7. Ensure this policy is understood and implemented throughout the organisation
8. Involve employees in health and safety decisions through consultation and co-operation
9. Maintain workplaces under our control in a condition that is safe and without risk to health
10. Regularly review and improve compliance with the policy and the management system that supports it
11. Provide sufficient information, instruction and supervision to enable all employees to avoid hazards and contribute to their own health and safety at work
12. Ensure that employees receive appropriate training, and are competent to carry out their designated responsibilities
13. Prevent injury or ill health to any personnel working on or visiting Hy-Ten Limited sites

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Quality and Environmental Policy Statement

Hy-Ten Limited is committed to maintaining and managing a cost effective service of the highest standard in conjunction with related standards.

The senior management is committed to establishing quality, environmental and business objectives to ensure continual improvement within the standards adopted, through investment in people, latest technology and equipment and the involvement of staff in identifying and resolving problems throughout the business in an environment of open communication.

Reviews of the Systems performance shall be carried out through Internal Audit.

Quality Management System (QMS)
The system has been developed to meet the requirements of BS EN ISO-9001.
Hy-Ten has developed common and site-specific procedures and written instructions, along with other documents, to manage and control the requirements of BS EN ISO-9001.
Sites that receive contracts or orders which state these standards as a contractual requirement will ensure that the System meets the respective standard and complies with any statutory or regulatory requirements relating to the product.

Environmental Management System (EMS)
Hy-Ten is committed to achieving environmental best practice throughout its business activities, wherever this is practicable, ensuring that these activities meet relevant legislation and regulations, and that they are acceptable to the community at large and that their environmental impact is reduced to a minimum. It recognises that the pursuit of economic growth and a healthy environment are closely linked.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Local Community Policy

Hy-Ten Limited is an established manufacturer of cut and bent steel reinforcement for use in the building and construction industry, and in the process of our business we are committed to engaging with the local community to recognise and understand the adverse effects of industrial activities within an urban settlement.

Awareness of Noise Issues Resulting from Steel Production
Ensuring agreed working hours are maintained to give consideration to the local neighbourhood.

Supplier Recognition to Local Environment
To ensure all suppliers are aware of local activities such as neighbouring educational institutes.

Community Investment
The management are totally committed to the employment of diversified local labour.

Complaints Procedure
Hy-Ten will maintain and record all complaints received and consult with the local community stakeholders affected by the production of its products and action accordingly.
The following information will be used as metrics to assess local community consultation.

1. Record the number of prosecutions resulting from local community complaints, but having the aim of zero.
2. Monitor the average response period for the closure of complaints.
3. Identify the stakeholders communicated with in respect of the complaint.
4. Identify stakeholders invited to engage in consultation should the company's activities have an adverse effect on neighbours.
5. Currently the company does not include financial donations to the local community.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Employment & Skills Policy

Hy-Ten Limited is an established manufacturer of cut and bent steel reinforcement for use in the building and construction industry, and in the process of our business we are committed to ensuring responsible employment and training.

Hy-Ten is committed to the learning and development of its employees through sustainable development in its recruitment and induction programme including relevant professional and functional training.

Recruitment & Induction
Hy-Ten recognise that its staff are fundamental to its success. To enable staff to become effective and efficient in their roles they will undergo a full induction and training programme. Any specialist training deemed necessary by Hy-Ten staff to carry out their roles effectively will be provided.

Professional Development
Senior staff will receive training to ensure that they are aware of the industry standards and obtain accreditations for their personal development and skills. Records will be maintained of education, training skills and experience.

Equal Opportunity
Hy-Ten is committed to the principal of equality applying employment policies which are fair, equitable and consistent with the skills and abilities of its employees.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Gender Pay Gap Report

At Hy-Ten Group Ltd, we are committed to creating an inclusive working environment based on fairness, equality and respect.

Our Gender Pay Gap Report responds to new Government legislation that came into force in April 2017, stipulating that all companies based in England, Scotland or Wales that have more than 250 employees must report their gender pay gap and bonus gaps as they are on the 5th April each year.

The Gender Pay Gap is defined as the difference in the average earnings of men and women over a standard period of time, regardless of their role or seniority. We are confident that men and women are paid equally for doing equivalent jobs across our business.

The following table shows our overall mean and median gender pay gap based on hourly rates of pay at the snapshot date of 5th April 2025.
It also illustrates the mean and median difference between bonuses paid to men and women in the year up to 5th April 2025.

2026 HY-TEN GROUP LTD GENDER PAY GAP REPORT	MEAN	MEDIAN
Difference in hourly rate of pay	12.9%	9.0%
Difference in bonus pay	-150.5%	-142.9%
	MALE	**FEMALE**
Percentage of employees who received bonus pay	42.9%	12.8%
Employees by pay quartile - upper quartile	92.1%	7.9%
Employees by pay quartile - upper middle quartile	82.5%	17.5%
Employees by pay quartile - lower middle quartile	76.2%	23.8%
Employees by pay quartile - lower quartile	74.6%	25.4%

For differences in rates of pay and bonuses, a positive % indicates that men receive a higher rate than women in our organisation.
A negative % indicates that men receive a lower rate than women in our organisation.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 10.03.2026

Greenhouse Gas Emissions & Waste Water Policy

(For ISO 14001: 2015 ISO 45001: 2018 and BES:6001 Compliant Depots)

Hy-Ten Limited is an established manufacturer of cut and bent steel reinforcement for use in the building and construction industry, and in the process of our business we are committed to ensuring that Greenhouse Gases and Waste Water are managed responsibly.

Along with our recognition of good business practice in achieving BS EN ISO 9001:2015, BS EN ISO 14001:2015 and ISO 45001:2018 we also commit to BS 14064 in line with government and industry aspirations.

Continual Improvement
To achieve high performance in establishing objectives and targets with continued review of performance in the reduction of greenhouse gas emissions and waste water.

Prevention of Pollution
To ensure all external suppliers/transport are aware of their responsibility to reduce their carbon footprint and greenhouse gas emissions including the responsible use of water resources.

Complying with Environmental Legislation
To further enhance the environmental system by reducing Hy-Ten's impacts in compliance with current legislation in achieving its objectives and targets, with continued monitoring.

Supplying Steel of Low Carbon Footprint
Monitoring the number of deliveries and source, ensuring most efficient transport systems and routes have been adopted from approved Eco-reinforcement suppliers.

Water Usage
Water is not used by Hy-Ten in the production of the products the company supplies. The usage is mainly for the welfare of staff. The usage is monitored in the volume of cubic meters and an analysis is kept in the system main folder for reference.

Reducing Carbon Emissions
Making more efficient use of utility supplies including the organisation of production/ transport and office environment to achieve the optimum in economy and efficiency thereby reducing the carbon footprint.

Greenhouse Gas Emissions Measurement
Greenhouse Gas Emissions generated during the manufacturing process are from the use of electricity. The metrics used for the measurement and assessment is to record the KWH used multiplied by the Carbon Trusts latest conversion figure to give the quantity of CO_2. The result of which is divided by the weight of product supplied.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Responsible Sourcing & Sustainability Policy Statement

(For ISO 14001: 2015 ISO 45001: 2018 and BES:6001 Compliant Depots)

HY-TEN

Hy-Ten Limited is an established manufacturer of cut and bent steel reinforcement for use in the building and construction industry, and in the process of our business we are committed to ensuring that the constituent materials used within our products and the supply chain that provide them are responsibly sourced.

Along with our recognition of good business practice in achieving BS EN ISO 9001:2015, BS EN ISO 14001:2015 and BS EN ISO 45001:2018 we also undertake to supply ECO-Reinforcement to the requirements of BES 6001 and commit to the following as part of the achievement.

Ethics
Adhere to standards of ethical behaviour applicable to our business activities.

Legislation
Review and adapt to legal requirement as set out in the above mentioned standards.

Supply Chain
Implement and maintain a supplier base that recognises and acts upon the need to have management systems appropriate to health and safety,environmental and to the supply of constituent materials.

Identification of Stakeholders
Identify and engage with stakeholders affected by our activities and if required liaising with the local community.

Complaints and Prosecutions
Maintain records of complaints and prosecutions using the procedures contained within the current quality assurance systems.

Rights at Work
Operate within international norms concerning human rights and labour practices.

Energy Utilisation, Resource Use, Water Usage, Waste Management Maintain and further enhance the environmental system to monitor and reduce Hy-Ten's impacts.

Operating Practices
Implement and maintain fair operating practices regarding employment and economic activities, including workforce training to achieve an efficient and safe workforce and working environment.

Sustainability of the Built Environment
Aim to develop innovative and effective products that improve the quality and sustainability of the built environment.

Continual Improvement
Hy-Ten Management commit to the continual improvement of the environmental, social and economic performance of the company and operate systems to monitor performance.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

General Waste Policy (ISO 14001: 2015)

Hy-Ten Limited is an established manufacturer of cut and bent steel reinforcement for use in the building and construction industry, and in the process of our business we are committed to ensuring that the waste generated during the course of our daily business is disposed of in a responsible manner.
The process operated conforms to BS EN ISO 14001:2015.

Continual Improvement
To achieve high performance in establishing objectives and targets with continued review of performance in the reduction of waste.

Prevention of Pollution
To ensure all waste is disposed of via the correct waste stream, hazardous or non-hazardous.

Complying With Environmental Legislation
To ensure waste is disposed of by contractors holding approved documentation and to keep transfer notes on file for review.

Reducing Waste Production
Making efficient use of all products used and to consider extended opportunities for use of products prior to disposal.

Waste Measurement
The measurement of waste is calculated against each waste stream using the metric of tonnes of waste produced multiplied x 100 divided by tonnes of product supplied to give the waste output per tonne. This information will be assessed to seek a reduction in Hy-Ten's environmental impact.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Resource Use Policy (For ISO-14001 and BES-6001 Compliant Depots)

Hy-Ten Limited is an established manufacturer of cut and bent steel reinforcement for use in the building and construction industry, and in the process of our business we are committed to ensuring that resource use is managed responsibly.

Along with our recognition of good business practice in achieving BS EN ISO 9001:2015, BS EN ISO 14001:2015 and BS EN ISO 45001: 2018. Hy-Ten wish to further enhance our business practice by ensuring the resources used by the company are used efficiently and effectively.

Recycled and Renewable Materials
Hy-Ten recognises the importance to use renewable materials over non-renewable materials to enhance the sustainability of the supply of Steel Reinforcement and therefore uses steel mills with BES6001 accreditation. This ensures the use of recycled material within the supply chain.

Resource Efficiency
Production procedures are created with the intention to reduce the production of scrap thereby minimising the wastage of prime material and therefore moderate the need to reprocess waste items.

Recycling of Residues
Residual reinforcement bar from the production process is collated and then recycled by an approved contractor which reduces the impact on non-renewable sources and enhances sustainability.

Metrics for Monitoring and Assessment
Recycled / renewable material will be calculated against all material used multiplied by 100 and divided by the total annual output to give the percentage proportion of total constituent material produced. The amount of recyclable output will be calculated against mass of annual saleable production output multiplied by 100 divided by the mass of annual constituent material input.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Equality & Diversity Policy

Hy-Ten Limited is committed to providing equality of opportunity and tackling discrimination and disadvantage, harassment and intimidation.

Hy-Ten seeks to ensure that every employee is treated fairly and with respect during the whole of their employment at Hy-Ten.

Hy-Ten does not tolerate the un-favourable treatment of anyone, as listed in the Equality Act 2010, on the grounds of their:

- Age
- Disability
- Gender Reassignment
- Marriage or Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation

A copy of this policy, signed by Hy-Ten's Chairman, is available at Hy-Ten's offices and is available to the public on request and is also on the company's website (www.hy-ten.co.uk, click on Downloads).

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Whistle Blowing Policy

Hy-Ten Limited is an established manufacturer of cut and bent steel reinforcement for use in the building and construction industry, and in the process of our business we are committed to ensuring employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

QUALIFYING DISCLOSURES

Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the company has committed a "relevant failure" by:

- **Committing a criminal offence.**
- **Failing to comply with a legal obligation.**
- **A miscarriage of justice.**
- **Endangering the health and safety of an individual.**
- **Environmental damage.**
- **Concealing any information relating to the above.**

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The company will take any concerns that you may raise relating to the above matters very seriously.

Hy-Ten encourage the use of this procedure if you are concerned about any wrong doing at work. However, if the procedure has been invoked for malicious reasons or in pursuit of a personal grudge, then you will be liable to immediate termination of employment or such lesser disciplinary sanction as may be appropriate in the circumstances.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Transport Policy (For CLOCS or FORS Compliant Depots)

Hy-Ten Limited is an established manufacturer of cut and bent steel reinforcement for use in the building and construction industry, and in the process of our business we are committed to transport being used for the movement of our products to be of a responsible source.

Along with our recognition of good business practice in achieving BS EN ISO 9001:2015, BS EN ISO 14001:2015 and BS EN ISO 45001: 2018. Hy-Ten undertakes to establish a policy and metrics for reducing the adverse social and environmental impacts of transport associated with supplies and delivery of products to our customers. Hy-Ten commits to the following as part of the achievement.

Environmental Impact of Transport
Ensure fleet vehicles comply with current legislation as set out by leading authorities such as Transport for London aimed at working lawfully and to best practice.

Responsible Hauliers
Hy-Ten management are totally committed to employing the services of responsible hauliers who recognise and implement best practice standards to minimise the impact of transport operations on the environment.

Transport Type and Distances
Monitor and record types of transport and distances travelled of incoming and outgoing deliveries to ensure most efficient use is achieved to reduce the adverse social and environmental impacts.

Monitoring of Carbon Emissions
Maintain records of transport movements to establish and reduce CO_2 emissions to achieve a reduced carbon footprint. The metrics used is to record the distance travelled of incoming and outgoing deliveries and to multiply the distance by DEFRA's fuel consumption figure and to multiply the result by DEFRA's HGV CO_2 per litre figure. The result of which is divided by the tonnes of product supplied.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Anti-Slavery & Human Trafficking Policy

Hy-Ten Limited is an established manufacturer of cut and bent steel reinforcement for use in the building and construction industry, and in the process of our business we are committed to ensuring there are no operations that support Slavery or Human Trafficking.

Anti-Slavery

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.
Someone is in slavery if they are:

- Forced to work through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- Dehumanised, treated as a commodity or bought and sold as 'property'.
- Physically constrained or has restrictions placed on his/her freedom of movement.

Human Trafficking

Human trafficking involves men, women and children being recruited, harboured or brought into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will. People don't necessarily have to be transported from one place to another for trafficking to take place.

When children are trafficked, no violence, deception or coercion needs to be involved: simply bringing them into exploitative conditions constitutes trafficking.
Hy-Ten seeks to ensure that Slavery and Human Trafficking is not present through its business operations.

Hy-Ten practices include: employee welfare; fair treatment of employees; equal opportunities in recruitment, training, promotion, work tasks, freedom of association and compliance with employment legislation.

The requirements of Ethical Trading Initiative (ETI) Base Code and standards of the International Labour Organization (ILO) are considered during issue and review of business practices.

Human Resources are in accordance with minimum wage legislation or industry norms. Reductions in wages for disciplinary matters are not permitted.

Recruitment and Social Rights is ensured: avoidance of child, slave, bonded or involuntary prison labour, the protection of human rights and the avoidance of harsh or inhumane treatment. Employees are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice as stated in their contract.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Modern Slavery Act Statement

This statement is for Hy-Ten Ltd and covers the following sites: Richmond (Head Office), Staines, Chatham, Bootle, Newark, Wolverhampton, Poole, Coseley, Durham, Newton Abbot, Brandon and Wallingford.

Modern slavery is a crime, and a morally unacceptable act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain. Hy-Ten Group has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operation and supply chain. Hy-Ten Group has taken concrete steps to tackle modern slavery as outlined in our statement.

This statement sets out the actions that Hy-Ten Group has taken to understand all potential modern slavery risks related to Hy-Ten's business, and to implement steps to prevent slavery and human trafficking during the financial year 2025/26.

Hy-Ten Group is a leading stockist and fabricator of concrete reinforcement bar, mesh, and accessories with a nationwide network of manufacturing centres which provide an innovative, rapid, and cost-effective service to building and civil engineering contractors throughout the UK and Eire.

Hy-Ten Group establishes relationships of trust and integrity with all its suppliers, this relies upon mutually beneficial factors. Hy-Ten Group's supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

Hy-Ten Group is not aware of any allegations of human trafficking/slavery activities against any suppliers. If made aware, Hy-Ten Group would act immediately to assist in eliminating any offenders from the supply chain.

Hy-Ten Group operates the following policies for identifying and preventing slavery and human trafficking in our operations that can be found online at http://www.hy-ten.co.uk/brochures-certifications.

Whistleblowing Policy – This encourages all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. Hy-Ten Ltd will ensure anything reported remains confidential to protect the identity of whistle-blower.

Code of Conduct – The code of conduct encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Hy-Ten Group conducts due diligence on all new suppliers, and on existing suppliers at regular intervals. As part of its efforts to monitor and reduce the risk of slavery and/or human trafficking occurring within its supply chains, Hy-Ten Group has adopted the following due diligence procedures when taking on new suppliers and reviewing its existing suppliers.

The Supplier warrants by return of a signed declaration that neither they nor any of its officers, employees, agents, or companies operating within their own supply chain has:
•Committed an offence under the Modern Slavery Act 2015 (MSA).
•Have been made aware they are subject to an investigation/prosecution relating to analleged MSA offence.
•Is aware of any circumstances within its supply chain that could give rise to an alleged MSAoffence or prosecution under the Act.

There were no suspicious activities or concerns reported for the reporting period.

Approval of new suppliers is carried out by a designated team to ensure a through screening before allowing any services to be provided, for this period there was a total of 79 applications made of which all were approved through our screening process.

Hy-Ten Group has defined a set of indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:
How many employees have completed Modern Slavery Focused training?
How many suppliers have filled out our MSA Supplier questionnaire?
How many reports have been made by our employees giving concern or suspicion of someone who may be affected?
What are the findings of our cross-functional Human Rights team, which reviews how we are addressing modern slavery and human trafficking?

Signed: **Date:** 17.08.2026

Mr Ian Jeffries,
Nominated Person Responsible for Annual Submission

Signed: **Date:** 17.08.2026

Mr Adrian Larkins,
Chairman Hy-Ten Ltd

Code of Conduct and Ethical Purchasing

Hy-Ten Ltd recognises the safety, health, environmental, social, legal and ethical impacts of its procurement decisions and its supply chain.

We wish to involve our suppliers in addressing any issues that are relevant to our commitment to ethics and sustainability. We therefore:

- Reserve the right, after appropriate consultation, to terminate any future relationship in which a supplier materially fails to meet our quality, legal and ethical standards.
- Will adopt and continuously improve our supply strategies in procuring all goods and services that meet our needs and are current to applicable legal and ethical standards.
- Will engage with our suppliers to gain a mutual understanding of the needs of Hy-Ten whilst understanding its suppliers' capabilities.
- Expect Hy-Ten suppliers and employees not to deliberately mislead each other, or take advantage of genuine errors made by either party.
- Expects employees to act impartially and objectively in all their purchasing activities and to keep written records where appropriate to demonstrate that their actions have been fair and above reproach.
- Require suppliers to keep written records where appropriate to demonstrate that their actions have been fair and above reproach.
- Expect Hy-Ten employees and suppliers to work in accordance with all Human Rights legislation. Specifically, this will include no child, forced labour, threat of violence, harassment, intimidation, debt bondage, bonded labour, or compulsory overtime when providing services.
- Promotes and supports a diversity and equality agenda with no discrimination on race, religion, disability, gender, sexual orientation or age grounds; and expects the same from its suppliers.
- Demands employees adopt best practice, when issuing competitive tenders or invites supplier quotes, judging bids on the merits of their competitive offerings and total life cycle cost.
- Requires employees to maintain an unimpeachable standard of integrity in all their business relationships.
- Expects Hy-Ten employees and suppliers to comply with the law of the countries in which they operate and with which Hy-Ten deals, and in all contractual obligations incurred by or on behalf of Hy-Ten.
- Expect our suppliers to assist us in the understanding and reduction of supply chain impacts on our environment, and risks related to the security of raw material supply. We expect suppliers to be open and transparent in assisting us in reporting publicly on product or service utilisation and any environmental impacts.
- Have zero tolerance for bribery or corruption and strict rules for the offering or acceptance of gifts and hospitality. Our suppliers must not offer bribes, kick-backs, gifts or hospitality to a Hy-Ten employee to gain a commercial advantage. Any conflicts of interest (for example a family connection between a supplier and Hy-Ten) must be disclosed immediately.
- Prohibit all forms of forced and underage labour in our supply chains.

Hy-Ten Ltd specifically expects that all our suppliers;

1. Accept responsibility for adopting and implementing acceptable health, safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards under which products are made and services provided. This includes all work contracted or sub-contracted.
2. Highlight to Hy-Ten any areas of legal or ethical concern so that both organisations can have a constructive dialogue about resolving any gaps or deficiencies.
3. If requested by Hy-Ten, report progress on implementing the ethical purchasing policy by describing actions taken and detailing future planned activity.

Both Hy-Ten and all its suppliers will;

- Work together as far as possible to highlight and neutralise areas of risk, concern and noncompliance;
- Ensure the immediate cessation of serious breaches of the code of conduct and, where these persist, terminate their business relationship;
- Ensure all employees are aware of their individual obligations under Hy-Ten Ltd Code of Conduct; and
- Recognise official regulation and inspection of workplace standards.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Anti-Bribery & Corruption Policy

Hy-Ten Limited is an established manufacturer of cut and bent steel reinforcement for use in the building and construction industry, and in the process of our business we are committed to ensuring no acts of Bribery or Corruption are carried out.

Bribery is a criminal offence. The company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by employees or by third parties acting for or on behalf of the company.

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

If Hy-Ten suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with Hy-Ten disciplinary procedures where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.

If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved, you are expected to report this to a Director. You may be asked to give a written account of events.

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from your Branch Manager.

Similarly, no gift or offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from your Branch Manager.

A record will be made by your Branch Manager of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the company reserves the right to amend this policy without prior notice.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026

Mental Health Policy Statement

It is the aim of our policy to promote a supportive and inclusive working environment that prioritises the mental health and wellbeing of all employees within the workplace, reducing the stigma associated with mental health issues.

Hy-Ten Limited will, as far as is reasonably practicable:

1. Ask managers to lead by example in promoting mental health awareness and support, recognising signs and responding appropriately.
2. Ensure employees have access to mental health resources and support services.
3. Foster an inclusive and non-discriminatory work environment.
4. Ask employees to take responsibility for their own mental health and wellbeing and support colleagues experiencing mental health issues.
5. Promote the utilisation of available resources and support services as needed.
6. Respect the confidentiality of mental health matters and the privacy of all colleagues.
7. Offer confidential counseling services via the Health Assured Wellbeing Programme, providing support for personal, family and work related issues.
8. Provide information on how to access the Employee Assistance Programme via noticeboards and circulars.
9. Establish a procedure for addressing mental health issues where employees are encouraged to report concerns via their supervisor/HR/the EAP.
10. Ensure that supervisors/HR will maintain confidentality and handle reports/assessments sensitively.
11. Ask HR to conduct regular follow up meetings (where required) to monitor the employee's progress and provide appropriate support.
12. Treat all mental health information made known by employees with the utmost confidentiality, without disclosure (unless required by law).
13. Prohibit any form of discrimination or harassment based on mental health status.
14. Ensure this policy is understood and implemented throughout the organisation, reviewing it annually to ensure its effectiveness and relevance.

Signed: *A. Larkins,*
Chairman Hy-Ten Ltd

Date: 04.03.2026