

Modern Slavery Act Section 54 Statement & Policy

This Modern Slavery and Human Trafficking Statement is a response to Section 54 (1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 30th September 2024.

Hathaway is committed to combatting slavery and human trafficking within our organisation, operations, supply chain, and products and services to ensure we do business in an ethical manner and with respect for our people and the communities in which they live in.

We have zero-tolerance towards slavery and require our supply chain to comply with our values.

The Modern Slavery Act recommends that you cover the following 6 areas in your statement:

- 1. Organisation structure and supply chains
- 2. Policies in relation to slavery and human trafficking
- 3. Due diligence processes
- 4. Risk assessment and management
- 5. Key performance indicators to measure effectiveness of steps being taken
- 6. Training on modern slavery and trafficking

1. Organisational Structure & Supply chains

The UK's leader in the design, manufacture and installation of roof and wall cladding systems working on projects throughout the UK. The Company was originally established in 1967, a private limited company with circa 100 employees.

We are committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. Click here to <u>view our website</u> and <u>organisational structure</u>. We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner.

2. Our policies in relation to slavery and human trafficking

This policy ensures there is no modern slavery or human trafficking in our supply chains or in any part of our business or operations. We all have a duty to be alert to risks, however small. Employees are expected to report their concerns and management to act upon them.

3. Due Diligence processes for slavery and human trafficking

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chain we undertake due diligence when taking on new suppliers and subcontractors and regularly review our existing supply chain with our QA procedure. Our process aims to identify and action potential risks, monitor potential risks across our business and supply chains and reduce the risk of slavery and human trafficking occurring in our business and supply chains by settling clear expectations of business partners and evaluating the modern slavery and human trafficking via our QA procedure.



4. Risk Assessment and Management

Hathaway undertake checks on new employees to ensure they are eligible to work in the UK. We consider our systems to monitor potential risk areas in our supply chains - expecting full compliance with all our employees, businesses and supply chains.

We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in the UK.

5. Effectiveness

Hathaway ensures each supplier and sub-contractor is required to complete a "Pre-Qualification Questionnaire" which includes a declaration by the potential supplier/sub-contractor are compliant in meeting the legislative requirements.

6. Training

Hathaway is committed to providing training to all staff where required to eliminate and address the issues of modern slavery within our business and supply chain.

This statement has been approved by Steven Price, Managing Director for Hathaway on behalf of the board of directors.

Steven Price Managing Director 1st January 2024







