



Hathaway Roofing Ltd. – Modern Slavery Policy including section 54

July 2026

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Hathaway Roofing Ltd
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Registered in England No. 3357937



Amendment history

| Revision | Reviewed By | Review Date | Purpose of change | Approved By |
|-----------------|--------------------|--------------------|---------------------------------|--------------------|
| 2 | HR – Board | July 2026 | Review of policy and section 54 | Board |
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Document issue and change

This document is subject to formal change and control procedures, amendments with updates typed in blue.

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- 1.2 Appendix A – Section 54 Compliance Framework (how Hathaway meets the legislative reporting requirements)
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Policy approved for issue by:

Signed



Steven Price, Director for Hathaway Roofing Ltd

Date: July 2026

1.1 Policy Statement

Hathaway is committed to conducting business ethically, responsibly and with integrity. We recognise our responsibility to prevent modern slavery, forced labour, servitude and human trafficking within our own operations and throughout our supply chain.

We operate a zero-tolerance approach to all forms of modern slavery and are committed to complying with the Modern Slavery Act 2015 and all other applicable legislation. We expect the same high standards from our employees, agency workers, contractors, subcontractors, suppliers and all other business partners.

This policy applies to all employees, directors, agency workers, temporary workers, apprentices, contractors, consultants, suppliers and any individual or organisation working on behalf of Hathaway.

Purpose

The purpose of this policy is to:

- Prevent modern slavery and human trafficking within our business and supply chains.
- Ensure compliance with the Modern Slavery Act 2015.
- Promote ethical and responsible business practices.
- Establish clear responsibilities for employees and business partners.
- Provide procedures for identifying, reporting and addressing concerns.

Our Business

Hathaway is a leading UK specialist in the design, manufacture and installation of roof and wall cladding systems. Established in 1967, the Company employs approximately 100 people and operates throughout the United Kingdom.

Our supply chain includes manufacturers, material suppliers, labour providers, subcontractors, plant hire companies, transport providers and professional service organisations.

Our Commitment

Hathaway is committed to:

- Operating with honesty, integrity and transparency.
- Preventing modern slavery in all business activities.
- Ensuring all workers are treated fairly, with dignity and respect.
- Maintaining effective systems and controls to reduce the risk of modern slavery.
- Working only with suppliers and contractors who share our commitment to ethical working practices.
- Taking immediate action where concerns are identified.

Responsibilities

The Board of Directors has overall responsibility for ensuring this policy is implemented effectively.

Managers are responsible for:

- Promoting awareness of this policy.
- Identifying and managing potential risks.

- Ensuring recruitment and procurement processes comply with Company procedures.
- Reporting any suspected breaches.

All employees have a responsibility to:

- Be alert to the signs of modern slavery and labour exploitation.
- Report any concerns immediately to their manager, HR or through the Company's Whistleblowing Policy.
- Cooperate with any investigation relating to suspected modern slavery.

Recruitment and Right to Work

Hathaway operates robust recruitment procedures to ensure all employees have the legal right to work in the United Kingdom.

Before employment commences, Right to Work checks are completed in accordance with current Home Office guidance. Copies of verified documentation are securely retained in line with legal requirements, and follow-up checks are undertaken where an individual has time-limited permission to work.

Recruitment processes are applied fairly, consistently and without discrimination.

Supply Chain Due Diligence

We recognise that modern slavery risks may exist within supply chains and are committed to minimising these risks through proportionate due diligence.

Our supplier approval process includes, where appropriate:

- Completion of supplier pre-qualification questionnaires.
- Assessment of supplier compliance with relevant legislation.
- Review of supplier ethical standards.
- Verification of appropriate insurance and business credentials.
- Ongoing supplier performance reviews through our Quality Assurance procedures.
- The right to request evidence of compliance where appropriate.

Suppliers, subcontractors and labour providers are expected to comply with all applicable employment and immigration legislation and operate to standards consistent with this policy.

Agency Workers, Contractors and Subcontractors

Where agency workers are engaged, Hathaway requires the supplying agency to confirm that compliant Right to Work checks have been completed before workers commence duties.

Where contractors or subcontractors are engaged directly, the Company may request evidence demonstrating compliance with employment and immigration legislation and reserves the right to audit compliance where appropriate.

Risk Assessment

Hathaway assesses modern slavery risks within its operations and supply chain as part of its supplier approval and procurement processes.

Risk assessments consider factors including:

- Geographic location.
- Industry sector.
- Use of temporary or agency labour.
- Labour-intensive activities.

- Previous compliance history.
- Nature of services provided.
-

Although the majority of our operations and suppliers are UK-based and we consider our overall risk to be relatively low, we remain vigilant and continually review our procedures.

Reporting Concerns

Employees and workers are encouraged to report any concerns regarding modern slavery, forced labour or human trafficking immediately.

Reports may be made to:

- A Line Manager
- Human Resources
- A Director
- Through the Company's Whistleblowing Policy

All reports will be treated seriously and investigated appropriately. No individual will suffer detrimental treatment for raising a genuine concern in good faith.

Training and Awareness

Hathaway is committed to ensuring employees understand the risks associated with modern slavery.

Appropriate guidance and training will be provided to employees involved in recruitment, procurement, contract management and supplier approval.

Awareness training may also be provided to other employees where appropriate.

Monitoring and Review

The effectiveness of this policy is monitored through:

- Recruitment and Right to Work compliance checks.
- Supplier approval and review processes.
- Internal audits and Quality Assurance procedures.
- Investigation of any reported concerns.
- Periodic review of Company policies and procedures.

This policy will be reviewed annually, or sooner where legislative changes or business requirements make this necessary, to ensure it remains effective and compliant with current legislation.

1.2 Appendix A – Section 54 Compliance Framework (how Hathaway meets the legislative reporting requirements)

This appendix supports Hathaway's Modern Slavery & Human Trafficking Policy and demonstrates how the Company meets the reporting expectations set out in Section 54 of the Modern Slavery Act 2015.

1. Organisation, Structure and Supply Chains

Hathaway is a UK specialist in the design, manufacture and installation of roof and wall cladding systems. Established in 1967, the Company employs approximately 100 employees and operates throughout the United Kingdom.

Our supply chain includes manufacturers, material suppliers, plant hire providers, labour providers, subcontractors, transport providers and professional service organisations. We are committed to ensuring that modern slavery and human trafficking have no place within our operations or supply chain.

2. Policies in Relation to Modern Slavery

Hathaway operates a zero-tolerance approach to modern slavery and human trafficking.

This commitment is supported through the following Company policies and procedures:

- Modern Slavery & Human Trafficking Policy.
- Whistleblowing Policy.
- Recruitment and Selection Policy.
- Right to Work Procedure.
- Supplier Approval Procedure.
- Code of Business Conduct.
- Equality, Diversity and Inclusion Policy.
- Disciplinary Policy.

These policies promote ethical behaviour, lawful employment practices and transparency throughout the business.

3. Due Diligence Processes

The Company undertakes proportionate due diligence to minimise the risk of modern slavery within its operations and supply chain.

Our due diligence includes:

- Supplier pre-qualification and approval processes.
- Assessment of supplier compliance with relevant legislation.
- Right to Work checks for all employees before employment commences.
- Monitoring of employees with time-limited permission to work.
- Review of supplier performance through Quality Assurance procedures.
- Investigation of any concerns raised regarding unethical labour practices.

4. Risk Assessment and Risk Management

Hathaway assesses the potential risk of modern slavery as part of its supplier approval, procurement and recruitment processes.

Risk factors considered include:

- Geographic location.
- Nature of goods or services supplied.

- Labour-intensive activities.
- Use of agency or temporary labour.
- Previous compliance history.
- Employment practices.

Whilst the majority of our business and supply chain operates within the United Kingdom and is considered low risk, we recognise that modern slavery can occur in any sector and therefore maintain appropriate monitoring and controls.

5. Measuring Effectiveness

To assess the effectiveness of our approach, Hathaway monitors:

- Completion of Right to Work checks.
- Supplier approval and compliance records.
- Completion of supplier declarations.
- Whistleblowing reports relating to labour exploitation.
- Internal audits and Quality Assurance reviews.
- Any reported incidents or concerns regarding modern slavery.

Where improvements are identified, appropriate corrective actions are implemented.

6. Training and Awareness

The Company provides appropriate guidance and awareness to employees involved in recruitment, procurement, supplier management and contract administration.

Employees are encouraged to recognise the indicators of modern slavery and understand their responsibility to report concerns promptly through management or the Company's Whistleblowing Policy.

7. Reporting Concerns

Any employee, worker, supplier or contractor who suspects modern slavery, forced labour or human trafficking is encouraged to report concerns immediately.

Reports are investigated promptly and confidentially. Hathaway will not tolerate retaliation against any individual who raises a genuine concern in good faith.

8. Board Approval

This policy and accompanying Section 54 compliance appendix are reviewed annually by the Board of Directors to ensure continued compliance with the Modern Slavery Act 2015 and to support continuous improvement in our ethical business practices.

This appendix should be read in conjunction with Hathaway's annual Modern Slavery Act Section 54 Statement, which is approved by the Board of Directors and signed by a Director prior to publication.

1.3 Appendix B – Annual Modern Slavery Act Statement (the annual statement for the relevant financial year)

Hathaway
Modern Slavery and Human Trafficking Statement
Financial Year Ending 30 September 2025

1. Introduction

This statement is made by Hathaway in accordance with Section 54(1) of the Modern Slavery Act 2015 and outlines the steps taken during the financial year ending 30 September 2025 to prevent modern slavery and human trafficking within our business operations and supply chains.

Modern slavery is a criminal offence and a violation of fundamental human rights. It encompasses slavery, servitude, forced or compulsory labour and human trafficking. Hathaway is committed to acting ethically, with integrity and transparency in all business dealings and to implementing effective systems and controls to minimise the risk of modern slavery occurring within our organisation or supply chain.

We operate a zero-tolerance approach to modern slavery and expect the same high standards from our employees, agency workers, contractors, subcontractors, suppliers and all other business partners.

2. Our Organisation

Hathaway is a leading UK specialist in the design, manufacture and installation of roof and wall cladding systems. Established in 1967, the Company delivers projects throughout the United Kingdom and employs approximately 100 people across manufacturing, installation, commercial and support functions.

Our supply chain consists primarily of UK-based manufacturers, material suppliers, labour providers, subcontractors, plant hire companies, transport providers and professional service organisations. Whilst we consider the overall risk within our own operations to be relatively low, we recognise that modern slavery can exist in any sector and remain committed to maintaining effective safeguards.

3. Our Policies

Our commitment to preventing modern slavery is supported by a range of policies and procedures that promote ethical business practices and responsible employment.

These include:

- Modern Slavery & Human Trafficking Policy
- Recruitment and Selection Policy
- Right to Work Procedure
- Supplier Approval Procedure
- Whistleblowing Policy
- Code of Business Conduct
- Equality, Diversity and Inclusion Policy
- Disciplinary Policy

These policies are reviewed periodically to ensure they remain effective and reflect current legislative requirements and best practice.

4. Due Diligence

Hathaway applies proportionate due diligence when engaging suppliers, subcontractors and labour providers.

During the reporting period the Company:

Continued to operate supplier approval and pre-qualification procedures.

Assessed suppliers against relevant legislative and business requirements.

Required suppliers and subcontractors to comply with all applicable employment legislation.

Reviewed supplier performance through Quality Assurance procedures.

Reserved the right to request evidence of compliance where appropriate.

Investigated any concerns relating to unethical labour practices should they arise.

These processes help minimise the risk of modern slavery within our supply chain and reinforce our commitment to responsible procurement.

5. Recruitment and Right to Work

Hathaway maintains robust recruitment procedures designed to prevent illegal working and labour exploitation.

Before employment commences, every employee is required to demonstrate their legal Right to Work in the United Kingdom in accordance with current Home Office guidance. Appropriate records are securely retained for the duration of employment and for at least two years after employment ends. Where an individual has time-limited permission to work, follow-up checks are completed before their permission expires.

These procedures are applied consistently to all prospective employees regardless of nationality or background.

6. Risk Assessment and Risk Management

The Company recognises that the construction sector presents potential risks associated with subcontracting, agency labour and complex supply chains.

Our risk management approach includes consideration of:

Labour-intensive activities.

Agency and temporary labour.

Subcontractor engagement.

Geographic location of suppliers.

Nature of goods and services supplied.

Previous compliance history.

Supplier performance and ongoing review.

Although the majority of our workforce and supply chain are UK-based, we remain vigilant and continue to review our procedures to ensure they remain effective.

7. Measuring Effectiveness

To assess the effectiveness of our approach, Hathaway monitors:

Completion of Right to Work checks.

Supplier approval and review processes.

Supplier declarations and pre-qualification documentation.

Internal Quality Assurance audits.

Reports received through management or the Whistleblowing Policy.

Compliance with Company policies and procedures.

During the financial year ending 30 September 2025:

No incidents of modern slavery or human trafficking were identified within our business operations.

No substantiated allegations of modern slavery were reported through Company reporting channels.

Supplier approval processes continued to include consideration of legislative compliance and ethical business practices.

The Company remains committed to continuous improvement and will strengthen its procedures where opportunities are identified.

8. Training and Awareness

Hathaway recognises that awareness is essential to preventing modern slavery.

Employees involved in recruitment, procurement, contract management and supplier approval receive appropriate guidance on recognising indicators of modern slavery and understanding their responsibilities under Company policies.

All employees are encouraged to report concerns immediately through management or the Company's Whistleblowing Policy, where they will be treated seriously and investigated appropriately.

9. Looking Forward

During the next reporting period, Hathaway will continue to:

Review and strengthen supplier due diligence procedures.

Monitor legislative developments and best practice guidance.

Review Company policies to ensure continued compliance.

Promote awareness of modern slavery throughout the business.

Continue monitoring suppliers, subcontractors and labour providers through our Quality Assurance processes.

Maintain robust recruitment and Right to Work procedures.