

GROUP ANTI TRAFFICKING AND SLAVERY POLICY

21st February 2025

Pages in the document – 4

Amendment Control

All changes are recorded on the Amendment Record detailed below.

Amendment	Date
First Issue	01/10/2020
Annual Review	09/01/2022
Annual Review	21/02/2023
Annual Review	21/02/2024
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Anti Trafficking and Slavery Policy

Guided by the beliefs and values in our “Who We Are” statement, Hawkins Group of Companies Ltd is committed to integrity and social responsibility. Paramount to this commitment is the manner in which we treat our employees and the way in which others within our supply chain treat their employees. This Policy outlines the efforts Hawkins Group of Companies Ltd makes to seek to eliminate human trafficking, slavery, forced labour and child labour from its global supply chain. This policy is designed to comply with, the UK Modern Slavery Act.

This Policy applies to all Hawkins Group of Companies Ltd businesses, employees, agents, subcontractors, and suppliers when acting within their scope of employment or contract with Hawkins Group of Companies Ltd.

Hawkins Group of Companies Ltd will not tolerate and will not condone the use of slavery, forced, involuntary or coerced labour, child labour, human trafficking or sex trafficking by any employee, agent, subcontractor or supplier in the operation or support of our business or the manufacture and distribution of our products. To that end, Hawkins Group of Companies Ltd shall, and shall require that its businesses, employees, agents, subcontractors, and suppliers:

1. Not engage in any form of human trafficking, whether by force, fraud, or coercion; or any form of involuntary servitude or slavery; or any form of sex trafficking or the procurement of any commercial sex act;
2. Not knowingly use any form of forced or involuntary labour, including through the use of (a) threats of serious harm to, or physical restraint against, a person or another person; (b) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not perform such labour or services, that the person or another person would suffer serious harm or physical restraint; or (c) any abuse or threatened abuse of law or the legal process;
3. Not engage in, or support the use of child labour and shall comply with all applicable local child labour laws;
4. Not destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses;
5. Not use misleading or fraudulent practices during the recruitment of employees or offering of employment, and shall endeavour to the extent possible to disclose to employees, in a format and language accessible to the employee, the basic information regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided or arranged by Hawkins Roofing Ltd or its agents), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work. If required by law or contract, provide an employment contract, recruitment agreement, or other required work document in writing, which shall be in a language the employee understands;
6. Comply with all applicable local wages, benefit, and working hours labour laws;
7. Not charge employees recruitment fees and shall not use recruiters that do not comply with local labour laws of the country in which the recruiting takes place;

Hawkins Group of Companies Ltd shall periodically review and evaluate its internal operations and its supply chain to identify and assess the potential risks of activity that could violate this Policy.

As part of its mandated annual employee training, Hawkins Group of Companies Ltd includes training on human trafficking and slavery to employees responsible for managing other employees as well as those employees responsible for its global supply chain.

Any Hawkins Group of Companies Ltd employee that is informed of or witnesses a violation of this Policy, or is uncertain about the proper course of action relating to the matters addressed in this Policy, is encouraged to immediately contact his or her supervisor. If the issue is not resolved or the employee is not comfortable raising the issue with his or her supervisor, the employee should use other reporting channels appropriate for your business unit.

Hawkins Group of Companies Ltd has a zero-tolerance policy regarding any of its employees, agents, subcontractors or suppliers who engage in or support the use of slavery, forced, involuntary or coerced labour, child labour, human trafficking or sex trafficking. Failure to comply with this Policy will result in disciplinary action up to or including termination of employment. If a subcontractor or supplier is found in violation of this policy, Hawkins Group of Companies Ltd will take prompt, remedial measures to address the violation, up to and including termination of the supplier or subcontractor.