

Modern Slavery – Anti-Slavery & Human Trafficking Policy

1 INTRODUCTION

Modern slavery is a criminal activity and a violation of human rights. The deprivation of a person's liberty by another in order to exploit them for personal or commercial gain is unacceptable, therefore Had-Fab Limited opposes any use of slavery or human trafficking in the manufacture and distribution of our products and fully commits to working under the Modern Slavery Act 2015.

We will not tolerate or condone any form or practice that constitutes human trafficking or slavery in our organisation.

2 SCOPE

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, contractors, external consultants, and third-party representatives.

3 RESPONSIBILITIES

The Board of Directors has overall responsibility for ensuring the policy complies with our legal and ethical obligations and that those under our control comply with it.

Management has overall responsibility for:

- ensuring those reporting to them understand and comply with this policy
- completing e-learning Modern Slavery courses to be trained to an appropriate level linked with their role

4 SUPPLIERS

Had-Fab Limited has zero tolerance to slavery and human trafficking and we expect our suppliers:

- not to use slave labour, illegal child labour or forced labour
- to ensure that the overall terms of employment are voluntary
- to follow all applicable laws pertaining to minimum age requirements, wages, overtime and benefits
- to be able to demonstrate compliance with this Policy at the request and satisfaction of Had-Fab Limited

Suppliers who are found to have or be engaging in human trafficking and slavery or refuse to cooperate with any audit to verify compliance with this Policy will be removed from Had Fab's approved supplier register.

5 RIGHT TO WORK COMPLIANCE

Had-Fab Limited ensures compliance with its obligations under the Immigration, Asylum & Nationality Act 2006, including Sections 15 to 25. All employees, agency workers, contractors, and subcontractors are required to provide documentation proving their legal right to work in the United Kingdom.

These measures apply equally to all workers and are designed to prevent illegal working, which can contribute to exploitation and modern slavery risks.

Right To Work Checks

All new employees are required to provide original documentation confirming their eligibility to work in the UK prior to commencing employment. Acceptable documents may include a passport or birth certificate together with official documentation confirming their NI Number.

Share Codes

Where an employee provides a Share Code as evidence of their right to work, Had Fab will complete the necessary online verification checks using the Home Office online checking service. A record of the check, including the date and outcome, will be retained in line with statutory requirements.

Any employee who cannot provide this will not be allowed to commence employment.

6 DUE DILIGENCE AND RISK MANAGEMENT

Had Fab will take reasonable steps to ensure compliance with all anti-slavery and human trafficking legislation, in our business and supply chains.

This includes:

- Providing appropriate training and awareness to staff where necessary, e.g. e-learning course on modern slavery
- This is specifically mentioned within our induction to all members of staff
- Conducting supplier checks and assessments where appropriate
- Reviewing supplier terms and ethical standards
- Assessing higher-risk suppliers or sectors more closely
- Requiring compliance with applicable UK legislation as part of supplier relationships
- Taking disciplinary action if breaches of this policy occur.

Where concerns are identified, we will take appropriate action, which may include further investigation, suspension of supply arrangements, or termination of contracts.

7 REPORTING CONCERNS

We encourage all employees, contractors, and third parties to report any concerns related to modern slavery or human trafficking within our business or supply chains.

Concerns should be reported to a line manager, directly to senior management, or the People Team. All reports will be treated seriously and investigated promptly. Individuals raising concerns in good faith will not suffer any detriment as a result.

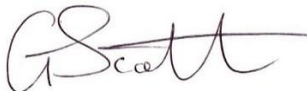
8 COMMUNICATION

We will communicate this statement to all relevant staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

9 BREACHES OF POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals or organisations working on our behalf if they breach this policy

Signed:



Managing Director

Date: 10/06/2026

Greg Scott

This policy will be reviewed annually updated as necessary in response to changes in employment law and/or company requirements.