



## Modern Slavery and Human Trafficking Statement Policy

### Roy Hatfield Group

#### Purpose:

This policy outlines Roy Hatfield Group's commitment to preventing modern slavery and human trafficking in line with the **Modern Slavery Act 2015**. As our annual turnover exceeds £36 million, we fully comply with the legal requirement to publish an annual **Modern Slavery Statement**.

#### Scope:

This policy applies to:

- All employees of Roy Hatfield Group
- Contractors, consultants, agency workers, and temporary staff
- Suppliers, partners, and third-party organisations with whom we do business

#### Our Business:

The **Roy Hatfield Group** supplies numerous mineral-based raw materials to heavy industry within the UK, Europe, and further afield.

Through **Hatfield Energy Ltd**, we supply **coal and coke** primarily to UK-based industrial end users for energy and carbon additions.

We are also responsible for **recycling large volumes of industrial waste** each year, as part of our commitment to sustainability and circular economic principles.

#### Our Commitment:

We have a **zero-tolerance approach** to all forms of modern slavery and are committed to:

- Acting ethically and transparently across our operations and supply chain
- Preventing any form of slavery, servitude, forced or compulsory labour, and human trafficking
- Publishing an **annual Modern Slavery Statement**, approved by our Board of Directors and signed by a director
- Making this statement available on our company website with a **prominent link from our homepage**

## **Our Policies:**

To support our anti-slavery stance, we operate and maintain the following key policies:

- **Modern Slavery and Human Trafficking Policy** – setting out our responsibilities and actions
- **Supplier Code of Conduct** – requiring all suppliers to commit to ethical practices, including prohibiting forced labour
- **Whistleblowing Policy** – enabling employees and third parties to raise concerns in confidence
- **Equal Opportunities Policy** – ensuring fair, transparent, and legal employment practices
- **Labour & Human Rights Policy** – aligning with international labour standards

All policies are reviewed at least annually to ensure they remain current and effective.

## **Due Diligence and Risk Management:**

We identify and address risks by:

- Assessing our supply chain, particularly high-risk geographies or sectors
- Conducting due diligence checks on suppliers and contractors
- Including modern slavery clauses in contracts, including rights to audit
- Terminating relationships with suppliers who fail to meet our standards

## **Training and Awareness:**

Training is provided to relevant staff to:

- Identify signs of modern slavery or exploitation
- Understand reporting procedures
- Support responsible procurement and hiring practices

Additional training is available to procurement and HR personnel who are most likely to encounter potential risks.

## **Performance Indicators:**

To measure the effectiveness of our actions, we may track:

- Supplier audits and risk assessments completed
- Employee training completion rates
- Number of incidents or concerns raised and resolved

These indicators are reviewed annually and used to inform our Modern Slavery Statement.

## **Reporting Concerns:**

Employees and third parties are encouraged to report suspicions of modern slavery through:

- A direct line manager
- Human Resources or the Compliance Officer
- Our confidential whistleblowing mechanism

All reports are taken seriously, treated confidentially, and thoroughly investigated with appropriate corrective action taken.

## **Responsibility and Oversight:**

- The **Board of Directors** is responsible for overall compliance with the Modern Slavery Act 2015
- Managers are responsible for ensuring policy awareness in their teams
- All staff are expected to comply with the policy and report any concerns

Our **annual Modern Slavery Statement** will be:

- Published within six months of the end of the financial year
- Approved by the Board and signed by a director
- Available on our website, clearly accessible from the homepage

**Breach of Policy:**

Any breach by employees may lead to disciplinary action, including dismissal. Any contractor or supplier found to be violating this policy may have their relationship with Roy Hatfield Group terminated immediately.

Mr G Hatfield – Director  
Issue A – 06.05.2025

Signature:

A handwritten signature in grey ink, appearing to be 'G Hatfield', written over a horizontal line.