

Hunters & Frankau

EST. 1790

IMPORTERS & DISTRIBUTORS OF THE FINEST CIGARS

Modern Slavery Act Statement for Hunters & Frankau Limited

Financial year Ended 31 December 2025

INTRODUCTION

This Modern Slavery Statement is published in accordance with the Modern Slavery Act (2015). Section 54 of the Act places UK businesses at the forefront of the fight against modern slavery. Hunters & Frankau supports the United Kingdom's stance on preventing modern slavery and human trafficking in all business operations and supply chains.

Hunters & Frankau is the UK's leading premium cigar importer and employs approximately 50 people in the UK. More information about our business can be found on our website <https://cigars.co.uk/about-us/>

ORGANISATION STRUCTURE AND SUPPLY CHAIN

The company is 50% privately owned and 50% owned by a Limited Liability Company registered in Spain.

We aim to maintain our position as the premier business to business supplier of a wide cigar selection that can be tailored to suit all pockets and palates. Widely regarded as the finest in the world, Cuban cigars, or 'Habanos' as they are commonly known, is our core business. We also export Havana cigars to our distributors in the Republic of Ireland, Gibraltar and the Channel Islands.

VegaFina from the Dominican Republic as well as our own label brand La Invicta, which uses the best tobacco from Nicaragua and Honduras, also form part of our extensive handmade portfolio. Our popular machine-made cigars include Villiger from Europe, Guantanamera, Cuban Minis and Cigarillos from Cuba.

Regardless of origin or production techniques, quality remains at the heart of our commitment to these prestigious brands. All our cigars are subject to rigorous checks and stored at optimum humidity and temperature levels to maintain their perfect smoking condition.

Where possible, we aim to build close relationships with our suppliers, meaning that we develop extensive knowledge of their operations and business practices, putting us in a strong position to identify malpractice.

POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

Our ethical business practices are supported by policies detailed below which aim to combat the causes or effects of Modern Slavery:

A Code of Conduct for employees, customers and suppliers, and Suppliers, and an Employee Handbook which covers:

- Human Rights (Modern Slavery and Human Trafficking)
- Money Laundering
- Anti-facilitation of Tax Evasion Policy

- Public interest Disclosures (Whistleblowing) Policy
- An Anti-Bribery & Corruption Policy
- A Fraud Policy

Our Code of Conduct can be found on our website <https://cigars.co.uk/company-policies/>

Company policies are reviewed annually or in response to legislative changes to ensure they remain effective and up-to-date.

We ensure our suppliers are aware of our policies and encourage them to adopt the same high standards. Our main supplier, Habanos SA, has a Code of Conduct which reflects our own.

DUE DILIGENCE PROCESSES RELATING TO SLAVERY AND HUMAN TRAFFICKING

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, we visit our main supplier, Habanos SA on a regular basis, including their cigar factories.

Our processes aim to:

- Identify, monitor and manage areas of potential risk in our business and supply chains
- Scrutinise any identified areas of risk within our business and supply chains
- Adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation and our supply chains
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

RISK AND COMPLIANCE

The management of risk falls under the overall scrutiny of the Board of Hunters & Frankau Limited.

We encourage all employees, suppliers, customers, and stakeholders to report any suspicions or concerns related to modern slavery within our business or supply chains.

ACTIONS TAKEN DURING THE YEAR

The following actions were taken during the year.

- Reviewed our Code of Conduct which sets out the standards of responsible behaviour of the Company that we expect all employees and anyone doing business with our Company to adhere to.
- Reviewed and updated our Employee Handbook which sets out policies and procedures to safeguard against modern slavery, including our commitment to fair employment practices, equal opportunities, and respect for human rights. We provide a safe and inclusive working environment for our employees, ensuring compliance with all applicable employment laws and regulations.
- Visited our main supplier, which included visits to cigar factories.
- Standard agenda item at the monthly Senior Management Meeting.

- The company became aware of reports alleging the use of prison labour in Cuba. Following due diligence and direct confirmation from the sole economic entity that manages the Cuban tobacco industry, we are satisfied that our products are not connected to any labour or human rights abuses.

ACTIONS TO BE TAKEN IN THE FORTHCOMING YEAR

- Build on existing processes to better understand any potential risks.
- We shall continue to monitor and evaluate our action to counter modern slavery and human trafficking at Board level.
- We shall continue our efforts to ensure our employees understand the risks associated with modern slavery in our business and supply chains so that they are equipped to detect, prevent, and report any concerns.
- Continue to monitor geopolitical and human rights developments in Cuba as part of our ongoing risk assessment procedures.

APPROVAL AND ENDORSEMENT

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Hunters & Frankau's slavery and human trafficking statement for the financial year ending 31 December 2025. This statement has been approved by the Board of Directors and signed on behalf of the Board of Directors:

Signature:

A handwritten signature in black ink, appearing to read 'Jemma Freeman', written in a cursive style.

Jemma Freeman
Executive Chairman

Date: 21 May 2026