

## **Modern Day Slavery Act Statement 2020**

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 30 September 2019. It sets out the steps taken by the Goonvean Group to prevent modern slavery and human trafficking in its business and supply chains. The statement is available on the Company's website and computer shared drive on individual company networks.

This document and company procedures were again reviewed across the Group following our financial year end, for consideration and approval at the 28 January 2020 Board Meeting. The Board is confident that the act is being adhered to, in fact above what is required, the profile high enough and any areas of risk continually monitored.

### **Overview**

We are aware that slavery, servitude, forced labour and human trafficking is a growing issue. We are totally opposed to slavery and human trafficking in all aspects of our operations including our supply chain and recognise the need however small we perceive the risk to be proactive and alert.

### **Organisation's Structure**

Goonvean Group (1)

### **Our Business**

Our Group is a diverse industrial UK grouping primarily manufacturing supplying a range of global niche markets.

### **Our Supply Chains**

We expect all our suppliers to participate in ethical trading audits, to provide employees with good working conditions, fair treatment and reasonable rates of pay. We expect workers' human rights to be respected and all applicable laws to be fully complied with. Responsibility for Anti-Slavery Initiatives lies with the Group Managing Director.

### **Relevant Policies**

We are committed to act with integrity in all our business dealings and to comply with existing legislation. We will not tolerate or condone any abuse of human rights and will take seriously any allegations. We operate a whistleblowing policy. Employment policies are detailed in our Staff Handbook and other communications provided from time to time.

### **Due Diligence Processes**

As part of our initiative to identify and mitigate the risk of slavery and human trafficking in our supply chain we undertake the following due diligence processes:-

Identify and assess potential risk areas in our supply chains.



Mitigate the risk of slavery and human trafficking occurring in our supply chains.  
Monitor potential risk areas in our supply chains.  
Protect whistle blowers.

### **Supplier Adherence to Our Values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values we include specific questions in our supplier audits.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide awareness training to existing and new staff.

**Jonathan Angilley**  
**MD Goonvean Holdings Ltd**

**Date 28 January 2020**

### **(1) Group Companies**

Goonvean Holdings Ltd  
Goonvean Fibres Ltd  
Goonvean Ltd  
Goonvean Aggregates Ltd  
Clear-flow Ltd  
Longcombe Labels Ltd  
UK Converters Ltd  
Wristbands UK Ltd  
ND Thornley Ltd  
North Devon Electronics Ltd  
IML Labels & Systems Ltd  
Beachoption Ltd  
Leed Marque Concepts Ltd  
Francis Holdings (Totnes) Ltd  
Foundry & Fabrication (Totnes) Ltd  
YPH Waste Management Ltd  
Dura-ID Solutions Ltd  
Cornwall Waste Solutions Ltd  
R H Fibreboard Containers Ltd