

Modern Slavery Statement for financial year 2017

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Harrier LLC has taken during the financial year ending 31 December 2017 and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Harrier LLC has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all areas of the business and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

We recognise our responsibility for upholding and protecting the rights of our employees and other individuals whom we deal with in all aspects of our operations. We believe a culture of respect for human rights is embedded throughout our business and that employees feel valued.

Our business

Harrier LLC is a leading digital and personalised print business located in Newton Abbot, Devon. For detailed information, please visit our website: www.harrierllc.co.uk

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees are encouraged to report any concerns related to the activities of our business or supply chain. Our policy is designed to make it easy for disclosures to be made, without fear of reprisals.
- Anti-bribery and corruption policy – We reject any form of bribery or corruption. Our policy provides guidance on how we expect our employees to act when conducting business.
- Ethical Trading Initiative. This policy explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our supply chain

Through our supply chain, we source materials, equipment, packaging and services. Whilst the majority of our direct suppliers are based in Europe, we recognise that our extended supply chain originates from around the world. Key supplies for a company like Harrier LLC include photo film, paper, personalised photo gifts (coasters/placemats, magnets & keyrings, mouse mats, ornaments, photo panels and teddy bears) which are sourced from Bulgaria, China, France, India, Italy, Spain, Switzerland, UK and the USA. Most of our paper is FSC or PEFC certified.

Our suppliers

Harrier LLC has a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence may include an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and on site ethical audits by our employees and/or with third party assistance (e.g. audit bodies) those companies identified as potentially being of high risk, which may include a review of working conditions and support on issues where required. We are in the process of putting in place robust systems and measures, which are intended to:

- Identify parts of our supply chains that could potentially be at risk of slavery or human trafficking including mapping those countries, sectors and transactions which provide for the greatest risk
- Insert appropriate commitments into contracts with new suppliers
- Add commitments into contracts with existing suppliers, when those contracts come up for review or renewal

Our anti-slavery policy will form part of our contracts with suppliers and they will be required to confirm that no part of their business operations contradicts this policy by confirming to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate) and provide safe working conditions in accordance with legislation
- (For international suppliers) They pay their employees any prevailing local minimum wage applicable within their country of operations
- We reserve the right to terminate the contract of a supplier at any time should any instances of modern slavery come to light

Training

We will conduct regular training and awareness, particularly for those employees within our organisation working in our procurement/buying teams or involved in recruitment so that they can look out for recognise the signs of modern slavery and understand what to do if they suspect that it is taking place within our business and supply chain. .

Our performance indicators

We will regularly assess the effectiveness of these systems, to ensure that they meet our objectives, and to determine whether further steps are required.

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors for Harrier LLC on 10th May 2018.

Name: Chris Hughes (Managing Director)

Signature:

Date:



10/5/18.