

HARVEY & BROCKLESS

the fine food c^o

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

This statement sets out the actions Harvey & Brockless Limited ('the Company') to understand any potential modern slavery risks related to its business and to implement steps aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the food sector industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

We are committed to ensuring that our goods are produced without exploitation of others and that our employees or workers, whether directly employed, contract or agency workers, are treated fairly and honestly, with respect, basic human rights and dignity.

We believe that by adopting and communicating our codes of practice we, in partnership with our suppliers and customers are taking practical steps towards improving the issues of ethical and responsible sourcing.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

This statement covers the activities of the Company:

The Company is a producer & distributor of speciality fine foods, supplying the smallest restaurants and farm shops to the largest food manufacturers. It supplies over 4,000 customers in the UK and internationally.

We source our products from over 350 suppliers in the UK and internationally.

COUNTRIES OF OPERATION AND SUPPLY

The Company buy goods from the following countries:

France	Denmark
Spain	Norway
Italy	Greece
Germany	Cyprus
Poland	Marocco
Finland	Turkey
Switzerland	New-Zealand

The Company purchases, wherever possible, from small suppliers, thereby supporting local businesses and benefiting customers by providing a diverse range of different products. The majority of our suppliers are EC based and operate within EC employment laws.

The Company operates in the UK and also from UAE since 2016.

HIGH-RISK ACTIVITIES

The Company does not have activities which could be considered to be at high risk of slavery or human trafficking.

RESPONSIBILITY

Responsibility for the Company's anti-slavery initiatives is as follows:

Policies: The HR Department is responsible for putting in place and reviewing policies and the process by which they were developed.

Risk assessments & Investigations/due diligence: The Purchasing & Technical Departments are responsible for human rights and modern slavery risk analysis, as well as for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.

Training: The Company has been working on an information & training programme which will be included in the Company training plan.

RELEVANT POLICIES

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy: The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.

Employee code of conduct: The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Corporate social responsibility :

- All our employment policies meet or exceed EEC employment legislation;
- We operate a strict non-discrimination policy. Any form of discrimination is subject to Company disciplinary proceedings;
- Each member of staff has a contract of employment;
- There is a Company handbook, available to all staff, which includes our expectations of employees and also their rights as employees;
- There are formal grievance procedures.

Supplier code of conduct: The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics.

In 2010, Harvey & Brockless Limited became a member of SEDEX, which is a not for profit membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. SEDEX is a great support to drive improvements in the ethical performance of global supply chains. Harvey & Brockless Limited SEDEX registration number is S000000027007.

Recruitment/Agency workers policy: The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

DUE DILIGENCE

The Company undertakes due diligence when considering taking on new suppliers. The Company's due diligence and reviews include:

- Conducting supplier audits or assessments through the Company's own staff;
- Requesting and checking for small suppliers or suppliers without any accreditation if they are members of SEDEX;
- Using SEDEX, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular.

PERFORMANCE INDICATORS

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- Requiring HR professionals coming into the business to be trained on modern slavery in 2019;
- Developing a system to review supply chain and suppliers in place during 2019

TRAINING

We consider that an awareness and understanding of the legislation by the people involved in dealing with and obtaining representations from suppliers is adequate training for our staff and the board of directors are satisfied that the relevant staff in our organisation have sufficient knowledge.

BOARD APPROVAL

This statement has been approved by the Company's board of Directors, who will review and update it annually.

Director's signature:

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

Director's name: Nick Martin

Date: 29 March 2019