

Slavery and Human Trafficking Statement

This statement sets out the steps that Gleadell Agriculture Ltd and Dunns (Long Sutton) Ltd, hereinafter 'the Company' has taken to ensure that slavery and human trafficking is not taking place in any part of our business or to the best of our knowledge any of our supply chains. The Company recognise that the issue of human trafficking is a global issue and is often difficult to detect; however, we will not tolerate any such activities and acknowledge that our relationships and open communication with our supply chain are critical to ensure that any issues are detected and resolved.

Our Business

The Company provides services and products including the marketing of combinable crops, fertiliser, seed and pulses, the processing of seed and pulses including the associated management of haulage, storage and elevation of crops to a standard meeting customer, industry, statutory and regulatory requirements. The company head office is based in Hemswell Cliff, North East Lincolnshire.

Ethical Standards

The risk of human trafficking and slavery within our business is mitigated as a result of our membership of SEDEX (Supplier Ethical Data Exchange), an organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains. SEDEX are able to support and advise the business, providing a global view on the supply chain. SEDEX has created the SEDEX Members Ethical Trade Audit (SMETA). The Company has achieved and maintains conformity to the SMETA 4 Pillar requirements, an audit covering the updated SMETA version 6.0 was successfully completed in January 2018. The audit includes a variety of potential issues including child labour, forced labour, health and safety, freedom of association; the right to collective bargaining, discrimination, disciplinary practices, working hours and remuneration. Where necessary the Company will use the SEDEX platform to report on trends across the supply chain where there may be the possibility of forced or bonded labour. Company policy embraces the Ethical Trading initiative (ETI) Base Code, promoting freedom of association and clearly defining that forced labour is unacceptable.

Our Supply Chains

The majority of our products are agricultural crops, seed and fertiliser which are predominantly purchased in the UK and Europe; however, occasionally from global sources. Products are sourced direct from farmers and indirectly from approved merchants or farming cooperatives.

Our direct and indirect supply chains for the products that service the operational needs of our business such as services and equipment are predominantly located in the UK; however, can extend globally for any specialist items or material not readily available locally.

Risk Assessment

The Company has completed a risk assessment covering all areas of our own business and supply chain to identify any slavery and human trafficking high-risk areas. The risk analysis takes into consideration the following:

1. The risk profile of individual countries based on the Global Slavery Index.
2. The extent to which specific demographic groups or types of employees or contractors may be more vulnerable than others for cultural, economic or operational reasons.
3. Any disclosures from trading partners.

We have targeted those parts of our supply chain and our business where we believe the greatest risk of slavery and human trafficking lies.

Monitoring and Compliance

As part of the company's due diligence process we have previously written to our supply chain to ensure our suppliers are aware of the The Modern Slavery Act 2015. Furthermore, the company's terms and conditions set out our requirement for suppliers to be committed to the rights and well-being of their employees and those within their own direct supply chain. Our terms state the requirement for supplier's commitment to ensure the appropriate steps are taken to ensure that everyone who works within their business or direct supply chain benefits from a working environment in which their fundamental rights and freedoms are respected. All employees must be legally entitled to work, registered to pay the appropriate tax and National Insurance contributions and that relevant legislation relating to health and safety, Working Time Regulations, pension enrolment and minimum wage are followed.

Where risk assessment has identified parts of our business or supply chain where we believe there is an increased risk of slavery and human trafficking a "Modern Slavery Supplier Questionnaire" has been sent for completion by the relevant supplier. Completed questionnaires have been reviewed and acted upon.

Training

All employees have received refresher training in the past 12 months in relation to the company's Anti-Slavery policy, the Ethical Trading Initiative (ETI) Base Code and the Supplier Ethical Data Exchange (SEDEX).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Gleadell Agriculture Limited and Dunns (long Sutton) Ltd for the financial year ending 30th June 2018.

This statement will be reviewed on an annual basis.

David Sheppard
Managing Director



November 2018