



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **FOR YEAR ENDING 31<sup>ST</sup> JANUARY 2019**

The Modern Slavery Act 2015 (“the Act”) came into effect on 29<sup>th</sup> October 2015. This statement, as required under the Act, applies to all companies within and associated to Harlow Agricultural Merchants Ltd (referred to in this statement as “The HAM Group”). The information included in the statement refers to the financial year 2018/2019.

#### **ORGANISATION AND STRUCTURE**

Harlow Agricultural Merchants Ltd is the parent company of The HAM Group and is based at Little Hallingbury, Bishop’s Stortford, Hertfordshire. The HAM Group consists of four companies:

- Harlow Agricultural Merchants Ltd:  
Trading of Cereals, Oilseeds, Pulses, Agrochemicals, Fertilisers & Seeds.
- Black Prince Holidays Ltd:  
Providers of Canal Narrowboat Holidays and Builders of Canal Narrowboats.
- Needham Chalks (HAM) Ltd:  
Chalk Extraction and Processing, Trading of Fertilisers.
- Alliance Technical Laboratories Ltd:  
Analytical and Consulting Microbiologist & Chemists.

The HAM Group is managed and controlled by the Harlow Agricultural Merchants Ltd Board of Directors.

#### **DEFINITIONS**

The HAM Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

## **COMMITMENT**

The HAM Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The HAM Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The HAM Group does not knowingly enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to The HAM Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The HAM Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

## **SUPPLY CHAINS**

In order to fulfil its activities, The HAM Group's main supply chains include those related to the provision of goods and services that are required in order for it to provide services to the various business in which they are involved in.

The HAM Group expects the highest standards from all of its suppliers and has put in place various measures to reduce the risk of slavery or human trafficking taking place in its supply chains or in any part of its business.

## **POTENTIAL EXPOSURE**

In general, The HAM Group considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## **STEPS**

The HAM Group carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The HAM Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, The HAM Group has taken the following steps to ensure that modern slavery is not taking place:

- Reviewing supplier contracts to include termination powers if the supplier is, or is suspected, to be involved in modern slavery;
- Obtaining suppliers commitment to the Modern Slavery Act 2015.

**POLICIES**

The HAM Group has additional policies and practices in place (such as whistle blowing) that support the modern slavery policy.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

**SIGNATURE:**  \_\_\_\_\_ Company Secretary/Director

**NAME:**  Melvin Trundle

**DATE:**  31<sup>st</sup> July 2019