

Anti-slavery and human trafficking statement

Our policy on modern slavery and human trafficking

We have an absolute zero tolerance policy to modern slavery. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We understand that modern slavery encompasses:

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

We are also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity.

Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur you must report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, please raise it with your manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should raise this issue using our Grievance Procedure.

Communication of the policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Responsibility for our policy

Our Commercial Director is responsible for compliance with this policy, and is the person to whom all queries or concerns regarding modern slavery should be addressed. The HR & Purchasing Teams will undertake an annual review of our obligations towards eradicating modern slavery within our organisation and supply chains.

Breaches of the policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

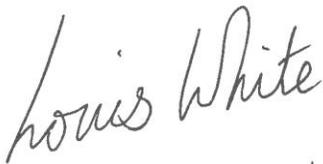
We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Review

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and applies to all companies within and associated to GLW Feeds Limited. It will be reviewed for each financial year.

This statement relates to the 2018 financial year and is approved by the Board.

Signed:

A handwritten signature in cursive script that reads "George White".

George White
Managing Director