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Modern slavery statement

Organisation

This statement applies to GLW Feeds (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2019/2020.

Organisational structure

The Organisation is a livestock feed manufacturer and straights trading business. Operating from a main manufacturing site in Shepshed Leicestershire, most business functions are performed at this site. The sales of our feeds are predominantly direct to livestock farmers throughout the UK. There is a straights trading office located in Wetherby, Yorkshire. The Organisation is controlled by a board of directors with departmental managers reporting directly to them. Demand for specific product ranges can be seasonal, however demand for our product portfolio is largely consistent throughout the year. The labour supplied to the Organisation in pursuance of its operation is carried out in entirely in the United Kingdom.

Definitions

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

The Organisation does not enter into business with any other 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 Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation 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 main supply chains of the Organisation include those related to the supply of raw materials from various suppliers in the United Kingdom and Europe. We understand that the Organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in its raw material supply chains because they involve the provision of labour in countries where protection against breaches of human rights may be more limited.

In general, the Organisation 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.

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, the Organisation remains in a position to publish its statement for the financial year 2019/2020 in line with the original publishing requirements.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

The risk of modern slavery did not increase, particularly as our suppliers and staffing levels remained largely unchanged.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Steps

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

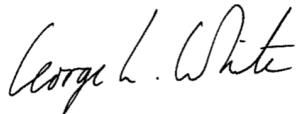
In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Online staff training for Modern Slavery Awareness
- New Starter Induction pack includes awareness training
- Review of existing supplier Modern Slavery Statements
- Assessment of new supplier contracts to meet obligations
- Inclusion of a Modern Slavery Policy
- Inclusion of a Whistleblowing Policy
- Review of staff remuneration in line with National Minimum Wage
- Use of business approved recruitment companies
- Annual review of our modern slavery obligations, risk assessment and actions

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer (Commercial Director) to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.



George Llewellyn White
Managing Director
31/12/2020