

# Modern Slavery Statement 2019

This statement has been published in accordance with the Modern Slavery Act 2015. It is set to help guide and prevent modern slavery and human trafficking in its business and supply chains.

## **Introduction**

This statement sets out Fullwood Packo Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2018/2019.

As part of the manufacturing Industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. We know that slavery, forced labour and human trafficking (modern slavery) is a global and growing issue given the rapid rise in global migration, existing in every region of the world. No sector or industry can be considered immune or untainted.

Fullwood Packo has a zero-tolerance approach to Modern Slavery of any kind within our operation and supply chain. We all have a responsibility to be alerted to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.



## **Organisational structure and supply chains**

This statement covers the activities of Fullwood Packo Ltd.

- Fullwood Packo's unique combination of fresh thinking, service agility and intelligent design & manufacturing, result in healthy and productive cows for the dairy farmer – we call it smart milking and cooling solutions.

The organisation currently operates in the following countries:

- Fullwood Packo Ltd UK,
- Fullwood Packo Netherlands,
- Fullwood Packo France SAS France,
- Fullwood Packo Ireland.
- Fullwood Packo Czech
- Fullwood Packo Belgium

## **Responsibility**

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

- **Policies:** Fullwood Procedures and Policies are controlled by the Group HR Department.
- **Risk assessments:** Risk assessments are carried out by our Procurement department. Supplier monitoring of goods and services purchased are done in the form of supplier questionnaires and site visits.
- **Investigations/due diligence:** All Fullwood Employees are responsible for due diligence within the workplace and supply chain. All reports of modern slavery will be fully investigated and appropriate remedial actions taken. In the event of a breach of the Modern Slavery Act 2015, immediate termination of contracts with suppliers will occur until a full investigation is carried out.
- **Training:** All employees will receive awareness on tackling modern slavery workshop to ensure awareness is given on what modern slavery and human trafficking is, and how it can be reported.

## Relevant policies

The organisation operates the following policies listed in the employee handbook 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 organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation'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 contact the two names people in our policy or the Modern Slavery Helpline on 08000121700
- **Employee code of conduct:** The organisation's code of conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Suppliers code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's
- **Recruitment/Agency workers:** The organisation 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.
- Fullwood Packo also enforces a Disabled employee policy, Religion and Belief policy and procedure, and an Employment of foreign works policy and procedure.

**Whistleblowing Policy**  
**Disabled Employees Policy**  
**Employment of Foreign Workers Policy and Procedure**  
**Supplier Code of Conduct Policy**

**Due diligence**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;

- Conducting supplier assessments through Supplier questionnaires. This is to be carried out Annually.
- Include compliance through Suppliers code of conducts.
- Checking if Suppliers are part of Sedex and also being a member of Sedex ourselves.

**Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will be providing training for staff members as necessary. This Modern Slavery Statement is readily available on HR drive for employees to request. The Modern Slavery Statement is to be issued as part of our induction pack, and will be published on our Website. Modern Slavery Training is to be delivered to key members of staff.

**Awareness-raising programme**

The organisation has raised awareness of modern slavery issues by Issuing posters to be placed around the company sites for all staff to read and be aware of.

These Posters will state the Modern Slavery Act 2015 and the Helpline number to call if they have any concerns they wish to discuss.

**Directors approval**

This statement was approved by the company Finance director, Edward Booth on the 30<sup>th</sup> September 2019, who will review and update it annually in accordance to publishing guidelines.