



# Modern Day Slavery Act Statement 2023

Goonvean

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Goonvean Holdings Ltd slavery and human trafficking statement for the financial year ending 30 September 2023. It sets out the steps taken by the Goonvean Holdings to prevent modern slavery and human trafficking in its business and supply chains. The statement is available on the Company's website and computer shared drive on individual company networks.

This document and company procedures were reviewed across the Group following our financial year end, for consideration and approval by the Board. The Board is fully committed to the prevention of all forms of slavery and human trafficking and are confident that the act is being adhered to and any areas of risk are continually monitored.

## *Overview*

We are aware that slavery, servitude, forced labour and human trafficking is a growing issue. We are totally opposed to slavery and human trafficking in all aspects of our operations including our supply chain and recognise the need, however small we perceive the risk, to be proactive and alert. We conduct our business sustainably, ethically and with respect to human rights and continually look at ways of improving our practices to prevent slavery and human trafficking.

## *Organisation's Structure*

Goonvean Holdings Ltd is the parent company which encompasses the subsidiary companies listed below. In this financial year Goonvean Holdings acquired a further 3 companies: S H Fiske Ltd, Atwell Labellers Ltd & Equinox Ltd to strengthen the Group's growth and success.

## *Our Business*

Our Group is a diverse, UK grouping of companies generally falling within Manufactured, Engineered, Reprocessed and Developed industry sectors.

## *Our Supply Chains*

There was a very significant review of risk across our supply chains previously as a result of Brexit and the COVID-19 pandemic. More recent risks assessed extend to the high inflation and rising costs of business from raw materials to utilities. During this time, we have been in close contact with all our partners throughout our supply chains reviewing every aspect. We expect all our suppliers to participate in ethical trading audits, to provide employees with good working conditions, fair treatment and reasonable rates of pay. We expect workers' human rights to be respected and all applicable laws to be fully complied with. Anti-Slavery Initiatives are the responsibility of the Group Managing Director.

## *Relevant Policies*

We are committed to act with integrity in all our business dealings and to comply with existing legislation. We will not tolerate or condone any abuse of human rights and will take seriously any allegations.

As well as our Whistleblowing Policy, all employment policies are detailed in our Staff Handbook and other communications provided from time to time. We have committed to a review of our staff handbook, policies and associated documentation. This will include a more in-depth questionnaire to be completed prior to a new employee joining our business to help identify any areas of concern regarding human trafficking and/or slavery.

We have fully reintroduced in-person Right to Work checks across our businesses in line with UK Government guidance following the COVID-19 pandemic. Over the coming months we plan to implement Supply Chain Management Policy across all of our businesses to include consideration of the risk of Modern Slavery in the supply chain.

## *Supply Chain Management Processes*

As part of our initiative to identify and mitigate the risk of slavery and human trafficking in our supply chain we undertake the following processes:

- Identify and assess potential risks in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor through due diligence process any potential risk areas in our supply chains.



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- Protect whistle blowers.
- Comply with financial auditing of our businesses.

## *Supplier Adherence to Our Values*

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values we include specific questions in our supplier audits and provide them with a Supplier Code of Conduct.

## *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 provide awareness training to existing and new staff.

Matthew Gazzard  
MD Goonvean Holdings Ltd  
27 March 2023

## *Group Companies*

- Goonvean Holdings Ltd
- Goonvean Fibres Ltd
- Goonvean Ltd
- Goonvean Aggregates Ltd
- Longcombe Labels Ltd
- Wristbands UK Ltd
- North Devon Electronics Ltd
- IML Labels & Systems Ltd
- Foundry & Fabrication (Totnes) Ltd
- YPH Waste Management Ltd
- Dura-ID Solutions Ltd
- Cornwall Waste Solutions Ltd
- Clear-flow Ltd
- R H Fibreboard Containers Ltd
- S H Fiske Ltd.
- Atwell Labellers Ltd.
- Equinox Ltd.