

Introduction

This statement has been produced in accordance with the Modern Slavery Act 2015. It constitutes our Modern Slavery and human trafficking statement for Goonvean Group Ltd and all subsidiary companies that make up the Group for the financial year ending 30 September 2024. The statement sets out measures taken by Goonvean Group Ltd to prevent modern slavery and human trafficking in its business and supply chains. The statement is available on the Company website and our internal system.

This document and relevant company procedures have been 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.

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.

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Organisational Structure

Goonvean Group Ltd is the parent company which encompasses the subsidiary companies listed below and is overseen by a Board of Directors.

In this financial year Goonvean Group acquired a further 4 companies: SMART Packaging Ltd, Duchy Network Solutions Ltd, Jades Components Ltd and UK LED Lighting Ltd and sold 2 companies: Cornwall Waste Solutions Ltd and Clear-Flow Ltd.

- Goonvean Holdings Ltd
- Goonvean Fibres Ltd
- Goonvean Ltd
- Goonvean Aggregates Ltd
- Longcombe Labels Ltd
- Wristbands UK Ltd
- North Devon Electronics Ltd

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- IML Labels & Systems Ltd
- Foundry & Fabrication (Totnes) Ltd
- YPH Waste Management Ltd
- Dura-ID Solutions Ltd
- R H Fibreboard Containers Ltd
- S H Fiske Ltd
- Atwell Labellers Ltd
- Equinox Ltd
- SMART Packaging Ltd
- Duchy Network Solutions Ltd
- Jades Components Ltd
- UK LED Lighting Ltd

Our diverse, UK group of companies have been placed into segments based on the nature of the industry sector they operate, these are Manufactured, Engineered, Reprocessed and Developed.

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 any allegations seriously.

As well as our Whistleblowing Policy, all employment policies are detailed in our Staff Handbook and other communications provided from time to time. During the financial year we introduced our vision and values to all staff that will nurture the change in culture to become more inclusive and supportive. We completed a review of our staff handbook, policies and associated documentation and these are currently being updated. In addition, there will be further associated supporting documentation such as managers guides ensuring procedures are adhered to. In relation to recruitment there will be 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 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.

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.

Steps

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

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 are introducing awareness training to existing and new staff.

Approval

This statement has been reviewed and approved by Matthew Gazzard, Goonvean Group Managing Director on behalf of the Goonvean Group Ltd Board members and subsidiary companies in March 2025.