



MODERN SLAVERY STATEMENT

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Masseys/Harpers Feeds Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

INTRODUCTION

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Masseys/Harpers Feeds Group has a zero-tolerance approach to any form of modern slavery.

OUR COMMITMENT

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

OUR BUSINESS

The Masseys/Harpers Feeds Group manufactures and supplies animal feed throughout the North West of England/Wales and The South West of England. We try to use British goods and suppliers wherever possible and source raw materials from around the World via UK agents.

OUR HIGH-RISK AREAS

We are in the process of identifying the areas of the business that we consider to be high risk and will be tackling these in order of importance. Our aim will be to mitigate the risk in these areas.

OUR POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
2. Anti-bribery policy. This policy clearly states that staff must not accept gifts or cash in exchange for services. Any gifts from customers or suppliers must be declared to Line Managers.
3. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

We will be reviewing our policies regularly to ensure they reflect current best practice and will be adding other appropriate policies as they are identified.

OUR SUPPLIERS

The Massey/Harpers Feeds Group will be contacting all our suppliers to ensure that each organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions].

We are developing an anti-slavery policy, which will form part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we will be amending our contracts to require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)

Harpers Home Mix Ltd.

Waldon Way, Holsworthy Industrial Estate, Holsworthy, Devon EX22 6ER

01409 254 300 • harpers@harpersfeeds.co.uk • www.harpersfeeds.co.uk

Company Registration No: 2737188 • Registered in England & Wales • VAT Registration No: 945 6844 79



4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light]

We will conduct due diligence on all suppliers before allowing them to become a preferred supplier.

TRAINING

We will introduce:

1. Regular training for all Line Managers and Supervisors to include:
 - Identifying potential warning signs
 - Procedure to follow if concerned
 - Using training materials available from organisations such as Stronger Together:
2. Regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.
3. Regularly conduct training for our fields sales teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.
4. Human Resources staff will attend external specialist workshops to ensure they have a thorough understanding of current issues and can, therefore, all policies and procedures reflect current best practice.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

1. No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

CONTINUING IMPROVEMENT OF POLICIES

We have become a Business Sponsor of the Stronger Together initiative and will continue to develop our practices in accordance with the changing nature of this issue and to reflect best practice.

Any enquiries should be directed to:

Tina Collins

Finance, Office & HR Manager

Harpers Feeds

Waldon Way

Holsworthy

Devon

EX22 6ER

Tel: 01409 254 300

Signed on behalf of Harpers Feeds

Kynan Massey, Managing Director

Reviewed June 2018