

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Melbourne Holdings Group during year ending 2018/2019 to prevent modern slavery and human trafficking in its business and supply chains.

## **Introduction**

We know that slavery, forced labour and human trafficking is global and a growing issue and there is no sector or industry which can be considered immune. Melbourne Holdings Group has a zero-tolerance approach to Modern Slavery, of any kind, within our operations and supply chain. We all have responsibility to be alert to the risks, however small in our business and in the wider supply chain. Our staff are expected to report concerns, using the appropriate reporting channels and management are expected to act upon them.

## **Our business, structure and supply chains**

**The Melbourne Holdings Group consists of:**

- Melbourne Holdings Ltd
- J L Priestley and Company Ltd
- The Roasting Company
- Smith Construction (Heckington) Ltd

### **Melbourne Holdings Ltd**

#### *Structure*

The company was established in 1979 as developers/builders of both commercial and residential properties. Melbourne Holdings Ltd incorporates both J L Priestley Bulk Services (haulage and warehousing) and Westmorlan Farms (arable farming).

#### *Supply Chain*

Melbourne Holdings Limited tend to build predominately in the County of Lincolnshire and employ sub-contractors for specialist trades such as electricians, plumbers and plasterers. Where possible the same sub-contractors are used on every site and we maintain long standing relationships. It is rare to engage with temporary labour but when we do, we use an agency which is a member of the Recruitment and Employment Federation as well as being licensed by the Gangmaster and Labour Abuse Authority. For the supply of construction materials, we use established companies which adhere to our policies and ethics.

J L Priestley Bulk Services employ their own drivers and hire subcontractor drivers. Our subcontractor's skill and experience is commensurate with our own and they are all members of relevant trade associations. All subcontractors are assessed and monitored using our QA procedure. They are members of the Road Haulage Association and adopt their policies regarding safe working practices and are audited by the British Retail Consortium.

As part of Westmorland Farm's supply chain, we engage in a regular audit for our recruitment and supply chain. We are also audited by SEDEX which is one of the world's largest collaborative platforms for sharing responsible sourcing data on supply chains.

### **J L Priestley and Company Limited**

#### *Structure*

The company was formed in 1974 and is one of the UK's largest manufacturers and re-processors of dried vegetables and food ingredients. Our supply chain includes suppliers from China, India, Europe and South America.

#### *Supply Chain*

We work with two agency suppliers and both certify that they comply with the Modern Slavery Act 2015 and UK Law.

We have a formal "Ethical Trading Policy" and we are an active member of SEDEX. As part of our supply chain, all suppliers must sign our Ethical Code of Practice and we encourage SEDEX membership. Our suppliers must also have British Retail Consortium accreditation.

### **The Roasting Company**

#### *Structure*

This is one of the UK's leading peanut and tree nut processors, supplying bulk ingredients into the manufacturing sectors and ready to eat snacks to retail and food service customers in the UK.

#### *Supply Chain*

The Roasting Company applies the Ethical Trade Initiative Base Code with regard to the fair and safe treatment of all employees and is a member of SEDEX. The materials, as part of the supply chain, are sourced from Argentina, Brazil, China, India, Nicaragua, USA and Vietnam. We operate a supplier approval system which requires a self-audit questionnaire which includes ethical trade questions.

### **Smith Construction (Heckington) Ltd**

#### *Structure*

Smith Construction has over 30 years' experience as specialists in the design, construction and maintenance of artificial turf sport and play facilities.

We employ sub-contractors for specialist trades such as fencing, floodlighting and irrigation. Our sub-contractor's skill and experience is commensurate with our own and they are all members of relevant trade associations. All subcontractors are assessed and monitored using our QA procedure.

#### *Supply Chain*

We operate a supplier policy and maintain a preferred supplier list.

### **Our Policies**

Melbourne Holdings Ltd internal policies include our Anti-Slavery Policy where we confirm that we have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We also operate a Whistleblowing Policy, aimed principally at our employees but also available to others working in our supply chains which

encourages staff to report any wrongdoing. All reports will be fully investigated, and appropriate remedial action will be taken.

## **Due diligence processes**

We understand that our biggest exposure to Modern Slavery is in our product supply chains. Accordingly, we carry out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in the organisation or supply chains, including conducting a review of the control of our suppliers.

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

- Measures are taken to identify and assess the potential risks in the supply chains which includes an online search to ensure the particular supplier has never been convicted of offences relating to modern slavery.
- Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradict with this policy.
- We undertake impact assessments of our services upon potential instances of slavery.

## **Training**

We train our employee's in Modern Slavery during their induction. This training includes awareness-raising of the signs of modern slavery and information on how to raise complaints within the Company.

## **Steps to Assess and Manage Risks**

We understand that Modern Slavery risk is not static and will continue our approach to mitigating this risk in the year ahead.

In order to assess the effectiveness of the measures taken we will be reviewing the following on an ongoing basis:-

- staff training levels;
- actions taken to strengthen supply chain auditing and verification;
- steps taken to upskill our high-risk suppliers and assessing their ability to detect and mitigate modern slavery risk in supply chains; and
- investigations undertaken into reports of modern slavery and remedial actions taken in response.

*Director Signature:*

