

Introduction

This statement sets out Howard Hunt (City) 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 1 October 2018 to 30 September 2019.

Howard Hunt (City) Ltd recognises that it has a responsibility to take a robust approach to preventing 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.

Organisational structure and supply chains

Howard Hunt (City) Ltd is a limited company incorporated in England and Wales under the registration number 02535108. The registered office is 3rd Floor Crown House, 151 High Rd, Loughton, Essex, IG10 4LG.

This statement covers the activities of Howard Hunt (City) Ltd which are as follows:

- Print Manufacturing
- Direct Mail Marketing

The organisation currently operates in the following countries:

- Howard Hunt (City) Ltd has offices and production facilities in England only.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Howard Hunt (City) Ltd's workforce is employed on a permanent contractual basis and agency staff are utilised to support peaks in trade. All right to work residency and employment history verification checks are conducted in accordance with the Immigration, Asylum and Nationality Act 2006.
- Howard Hunt (City) Ltd carries out desktop audits on each of its suppliers and outsourcing providers on an annual basis.

Howard Hunt (City) Ltd does not consider any of its activities to be deemed high risk.

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

- **Policies:** The Commercial Director and HR Administrator

- **Investigations/due diligence:** The Quality Compliance Manager, Executive Team and HR administrator are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** The Quality Compliance Manager and HR administrator are responsible for ensuring that the awareness of slavery and human trafficking risks are communicated during company Inductions

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its (Howard Hunt (City) Ltd policies can be found in the HR policies and procedures manual):

- **Anti-Bribery Policy (02):**
Howard Hunt (City) Ltd.'s Anti-Bribery Policy aims to prevent any form of bribery being committed within Howard Hunt (City) Ltd and by any stakeholder(s) associated with its business. Howard Hunt (City) Ltd.'s Board of Directors foster a culture of integrity where bribery is unacceptable. This policy is communicated to all employees and forms part of the induction programme.
- **Ethical Policy (08):**
Howard Hunt (City) Ltd 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. As part of the supply chain selection process all potential and existing suppliers are required to complete a Supplier Questionnaire to assess their suitability as a supplier. Within the Supplier Questionnaire all suppliers are required to provide evidence of their compliance towards Labour Standards and the principals of this standard as well as the Asylum & Immigration Act 2006. This enables the Commercial Director to identify any potential risks to the quality of the service provision or goods being provided by the supplier and prevent any slavery or human trafficking. All suppliers are audited against the supplier code of conduct.
- **Recruitment Policy (14):**
Prior to commencement of employment all employees are subject to right to work, residency checks in accordance with the Immigration Asylum and Nationality Act 2006. The Recruitment Policy is compliant to all EU and UK legislation, including the minimum wage and therefore is not at risk of slavery and human trafficking.
- **Whistleblowing Policy (19):**
Howard Hunt (City) Ltd encourages all its stakeholders to report any concerns related to the direct activities, or the supply chains of, the organisation. This can include any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Howard Hunt (City) Ltd.'s policy is designed to make it easy for

workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report any activities associated to slavery and human trafficking by contacting their immediate line manager or Human Resources.

- **Corporate Social Responsibility Policy (POL-HR-03):**
Corporate Social Responsibility covers the responsibilities of the Board of Directors and the organisation's commitment towards the external Environment, Health & Safety, Workplace responsibilities and assurance to the supplier chain code of conduct. The Policy is communicated to the whole workforce and forms part of the induction programme.

Due diligence

Howard Hunt (City) Ltd undertakes due diligence when considering taking on new suppliers and reviews its existing suppliers annually. The organisation's due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier
- If required, take steps to improve substandard suppliers' practices, including providing advice to suppliers and require them to implement action plans where applicable. Audits carried out on Howard Hunt (City) Limited suppliers have confirmed that they meet the Howard Hunt (City) supplier code of conduct and therefore no improvement plans have been invoked
- If required, conducting supplier audits or assessments with more focus on slavery and human trafficking where general risks are identified
- Collaborating with suppliers who participate in initiatives with an emphasis on human rights in general, but with a robust stance on alleviating slavery and human trafficking, such as Stronger Together.
- Commit to and maintain membership of SEDEX to ensure effective supply chain management, reduce risk, protect Howard Hunt (City) Ltd.'s reputation and improve supply chain practices

Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is [select the relevant KPIs from the list below]:

- Reviewing its existing supply chains on an annual basis to determine if there have been any changes to their practices

Training

The organisation's modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a

country's national minimum wage, or the provision of products by an unrealistic deadline;

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The posters explain to staff:

- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

Board approval

This statement was approved by the organisation's Managing Director, who review's and update's it annually.

Name: Danny Clarke

Position: Managing Director

Date: 01/10/2018

Signature:

