



## Modern Slavery Act 2015 Policy Statement

Harlow Printing Limited's anti-slavery policy reflects our aim to act transparently, respectfully and with integrity in all our business relationships. We do not tolerate slavery or human trafficking in any part of our business and are committed to ensuring that it does not take place in our supply chains. We implement and enforce effective systems and controls, to mitigate this risk.

### OUR SUPPLY CHAINS

We have reviewed our purchases to understand the nature of all of our suppliers to help us deliver our aims and objectives.

### RISK ASSESSMENT AND DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We have in place, systems to mitigate the risk of slavery and human trafficking occurring in our supply chains, allowing us to assess, identify, address and monitor risk areas. We assess the risk of slavery or human trafficking occurring in our supply chains and apply enhanced checks where higher-risk areas are identified.

#### Existing Supply Chain

As part of our risk management process, our Supply Chain Committee, headed by our Production Director, carries out a risk assessment to consider any existing or future arrangements with third parties. This includes identification of:

- All agencies we use to provide staff or services, where there is a heightened risk of poor practice, particularly where they employ non-UK nationals or in light of the services the staff are asked to provide;
- Suppliers whose work involves a high level of physical labour: and
- Relationships involving suppliers operating outside the UK, in countries where controls on employment practices may be weaker.

We have assessed the responses and identified risk areas so that we could review those relationships in more detail. Our Supply Chain Committee works with relevant Heads of Department to consider each situation individually: this is an ongoing exercise.

#### Future Suppliers

We will carry out risk assessments for new suppliers to consider the likelihood of maltreatment of staff or other unsatisfactory factors. This may mean that we decide not to work with them or seek further information, or assurances, before proceeding. For new suppliers where a higher risk is identified, the following applies:

- If the supplier is required to comply with the Modern Slavery Act 2015, we will review their own published policies on modern slavery.
- For other suppliers, we will seek declarations that they meet appropriate requirements and may ask them to give information on their working practices.
- We will apply appropriate vetting procedures, based on the level of risk identified, to ensure we are comfortable that any risks involving slavery can be identified and addressed promptly.



### **SUPPLIER ADHERENCE TO OUR POLICY**

To ensure all those in our supply chain comply with our policy, we have in place a comprehensive supplier approval document stating clearly that we have the right to audit supplier premises (where deemed appropriate and practically possible) and conduct regular audits to check compliance with our policies and procedures. Representatives from our Supply Chain Committee, our Human Resources Director and Commercial Director support and uphold the Programme.

### **RAISING AWARENESS**

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 training within our induction programme as well as Department Heads providing oral reminders of good practice.

### **Approval for this Statement**

This statement was approved by the Board of Directors on 1<sup>st</sup> November 2023