



Modern Slavery Act 2015 Policy Statement

Introduction

This statement sets out Harlow Printing Limited's approach to understanding and addressing any potential slavery and human trafficking risks within its business and supply chains. Our aim is 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.

The Organization's Structure, its Business, and its Supply Chains

Harlow Printing was registered as a limited company in 1947. We currently utilise four production plants in the North East of England, as well as a Warehouse and Distribution Centre, also in the North East of England. We employ 120, permanent members of staff.

Business operations are conducted in-line with the following accreditations:

- ISO9001 Quality Standard
- ISO14001 Environmental Standard
- ISO45001 Health and Safety Standard
- ISO27001 Security Management
- Cyber Essentials plus
- ISO22301 Business Continuity

We provide a print and print management solution to the NHS, the Public Sector, a range of private organisations, as well as the Gaming & Entertainment industry with an annual turnover of £14 Million.

All consumables utilised in the manufacturing process are sustainably sourced from a UK supply chain, which is evaluated and audited on a quarterly basis, or inline with changes in legislation, for reliability and compliance with our policies and procedures.

Definitions

The Company considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement

Commitment

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its employees and, additionally, its supply chains.



The Company does not enter into business with any other Company, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.

The Company is committed to ensuring that there is no modern slavery or human trafficking within our supply chains or any part of our business. The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and modern trafficking in its operations:

- Public Interest Disclosure (Whistle-blowers) Policy
- Ethics and Conduct Policy
- Supplier/procurement code of conduct

The Company's Due Diligence Processes in Relation to Slavery and Human Trafficking and in its Business and Supply Chains.

As part of our initiative to identify and mitigate the risk of slavery and human trafficking occurring within our business and supply chains, the Company undertakes due diligence when taking on new suppliers and regularly reviews its existing ones. This includes:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a quarterly basis, all aspects of the supply chain based on the supply chain mapping
- conducting supplier audits or assessments through the organisation's Supply Chain Committee, applying a greater degree of focus on slavery and human trafficking, identifying general risks
- taking steps to improve substandard suppliers' practices and issuing improvement notices
- ensure suppliers are checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- termination of business relationships within the supply chain where suppliers are found to violate our supplier code of conduct

The Company's Effectiveness in Ensuring that Slavery and Human Trafficking is not Taking Place in its Business or Supply Chains, Measured against Relevant Performance Indicators

Harlow Printing Limited has reviewed its key performance indicators (KPIs) and as a result, the Company is:

- Delivering a refresher training programme on Modern Slavery to include employees working in supply chain management, purchasing, quality & sales and HR professionals with training to be completed by 31st March 2024.



- developing a paperless system within a CRM for supply chain verification, expected to be in place by 30th June 2023; and
- reviewing its existing supply chain, whereby the organisation will provide a written copy of the Harlow Printing Supplier Code of Conduct requiring each supplier to confirm compliance in writing by 30th June 2023

Training surrounding Slavery and Human Trafficking available to Company Employees

As a result of Harlow Printing's review of its effectiveness in identifying, reducing & mitigating the risk of slavery and human trafficking in its business operations and supply chains, the organisation requires staff working in supply chain/purchasing, quality, sales & product support including all managers and HR professionals to complete mandatory training and refresher training in recognizing and reporting Modern Slavery and Human Trafficking.

Endorsement

The statement has been approved by Harlow Printing Senior Executives. on 1st November 2023, and will be reviewed and updated on an annual basis or inline with changes in legislation.