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## **Linwood Crops Ltd. – Statement on Modern Slavery for Financial Year 2019/20**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Linwood Crops Ltd. (LCL) 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. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. LCL has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, 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**

LCL was established in 2016.

The maximum number of employees has been 30, with 80% of these being directly employed. LCL is committed to both compliance with the Modern Slavery Act and to the identification and eradication of slavery, servitude and human trafficking as defined by the act. LCL is also committed to supporting its suppliers to ensure their practices are legitimate, ethical and in step with the values of the company.

### **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking does not take place anywhere within our supply chain.

### **Relevant Policies**

In keeping with our commitment to act with integrity in all our business dealing, many of our existing policies ensure that there is no slavery or human trafficking in any part of our supply chain.

Our relevant policies include:

- Employment Policy;
- Discrimination & Harassment Policy;
- Anti-Bribery and Corruption Policy;
- Ethical Trading Policy.

Our policies set out the behaviours we expect from employees in the dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisors, governments and competitors. All employees are expected to act with integrity in accordance with the standard of behaviour set out within our relevant policies.

We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions and the company relevant policies. We encourage employees to raise concerns where breaches of our policies have occurred.

We actively support employee engagement, representation, dialogue and the ability of an employee to raise potential concerns or grievances. Freedom of association and the right to collective bargaining is a core labour standard that we respect as guided by the International Labour Organisation (ILO). We apply our employment practices in line with, and in certain aspects exceeding the requirements of, local legislation.

### **Risk Assessment and Due Diligence**

Our risk of slavery and human trafficking is substantially avoided and mitigated as a result of policies and procedures as well as the oversight built into our business operations, and the knowledge and skill of our staff. We assess risk based on a number of factors such as geographical risk indices pertaining to human rights, the level of supply chain control, external governance factors and the levels of political stability

We consider that the most significant risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control.

We undertake due diligence when considering new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include;

- Mapping the supply chain broadly to assess particular products or geographical risk of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risk of each new supplier. This is achieved by using a third-party company to send out cloud-based desktop audits which are reviewed by qualified social compliance auditors
- Where the desktop audits identify risks, corrective action plans are sent out to our suppliers that are not meeting compliance or our expectations
- Conducting supplier audits using accredited third-party auditors
- Invoking sanctions against suppliers that fail to improve their performance in-line with an action plan. Serious violations of our policies, lead to termination of our business relationships.

### **Training and Awareness**

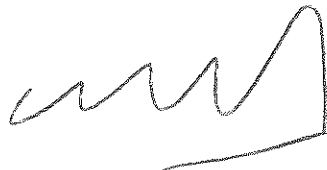
We ensure that we have competency within our organisation, through training relating to human rights and the awareness of the social accountability standard SA8000. We use accredited third-party supplier auditors who are trained social compliance auditors to work and advise our management team and employees.

Human rights awareness training has been further directed to personnel who work in human resources. Specific supplier standards training is directed at procurement personnel. More general awareness is available throughout the wider organisation through our relevant policies.

### **Board of Directors Approval**

LCL will never knowingly enter into a business relationship with any organisation involved with slavery, servitude or human trafficking. The senior management of the company accepts responsibility for the implementation of any policy in relation to this matter and for the provision of adequate resources to ensure that slavery, servitude or human trafficking is not taking place in the company or its supply chain.

Signed:

A handwritten signature in black ink, appearing to read 'Chris Marshall', with a stylized, wavy line above it.

Chris Marshall  
Managing Director

Date:

5<sup>th</sup> April 2019