**ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**

**AND POLICY**

**POLICY STATEMENT**

This statement is made on behalf of Kelkay Ltd pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act'), and constitutes our Company’s group's slavery and human trafficking statement for the financial year ending 31st October 2019.

**Introduction**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships; and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

**Our business and structure**

Kelkay is a family business with a market-leading position in garden landscaping products. The company manufactures and distributes decorative aggregates, paving and water features through gardening retailers in the UK and Ireland.

With a dedicated team of regional sales representatives and a highly experienced team located at their main manufacturing and distribution site in East Yorkshire, Kelkay places a great deal of emphasis on customer care, service excellence and reliability. We have a modern approach to our operations combined with traditional family values.

Kelkay has a solid reputation as a market leader in garden landscaping products. In order to provide excellent services and expertise we procure a range of goods and services from third party suppliers who may, in turn, enter into sub-contracts with their suppliers. As a respected and reputable organisation we will not trade or partner with any business or organisation which is involved in the shocking practice of Modern Slavery however remotely or indirectly.

**Our supply chains and their adherence to our values and ethics**

Our supply chains include manufacturing, transport, procurement, publishing and printing services, IT services, conference & venue suppliers, training providers, Business and HR consultants, and marketing & PR services. We are reviewing the risks that these supply chains can present.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain to comply with our values and ethics.

To this end we have the following measures in place:

* We provide all our high-risk suppliers with a copy of our Anti-Slavery and Human Trafficking Policy and we ask them to comply with it, and the requirements of the Modern Slavery Act 2015
* We are currently putting systems in place to encourage the reporting of concerns and the protection of whistle blowers.
* We will look to insert a clause into our contracts for services requiring that they comply with the provisions of the Act.

As part of our procurement process, we may engage only with suppliers and contractors who confirm their compliance with the Act.

Antony Harker

**Managing Director**

**Kelkay Ltd**

**ANTI-SLAVERY POLICY AND PROCEDURES**

This policy applies to all individuals working for the Company or on the Company’s behalf in any capacity, including employees, directors, managers, agency workers, apprentices, volunteers, agents, contractors, consultants and business partners.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to.

We have adapted our existing corporate policies to incorporate modern slavery and human trafficking issues, including our Company’s Public Disclosure (whistleblowing) Policy which allows employees to report any concerns confidentially.

**Responsibility for the policy**

The **board of directors** has overall responsibility for ensuring that this policy complies with the Company’s legal and ethical obligations.

The SHEQ Manager has day-to-day responsibility for implementing this policy, annual preparation of our slavery and human trafficking statement, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company’s business or supply chains.

**Line managers** are responsible for ensuring that those reporting to them understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the Company’s business or supply chains, whether in the UK or abroad, is the responsibility of **all those working for the Company or under the Company’s control**. They are required to avoid any activity that might lead to a breach of this policy.

**Compliance**

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company’s business or supply chains as soon as possible to their line manager or report it in accordance with the Company’s Public Disclosure (whistleblowing) Policy. Employees can also contact the government’s Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring that no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

**Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk, where possible, we build long standing relationships with suppliers and make clear our expectations of business behaviour. We are in the process of carrying out due diligence on all our high-risk suppliers so that the risk of modern slavery is considered as part of our procurement process.

In order to monitor potential risk areas in our supply chains on an ongoing basis we are planning to conduct audits of high risk suppliers, particularly those suppliers that operate out of countries ranked highly on the Walk Free Foundation’s Global Slavery Index, which measures the estimated prevalence of modern slavery.

**Training and communication**

The Company’s zero tolerance approach to modern slavery will be communicated to all staff, suppliers, contractors and other business partners when entering into new or renewed contracts with them.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will ensure that all staff involved in procurement and/or supply chain management are aware of their responsibilities.

The policy will be highlighted to all new staff as part of their induction to the Company.

**Breach of the policy**

**5. Breaches of this policy**

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Sanctions for breach of the policy should be clearly set out and should include either:

* Disciplinary action or dismissal if the breach is by a member of staff.
* Termination of the contract if the breach is by a supplier, contractor or other business partner.

[Hide Note](http://uk.practicallaw.com/cs/Satellite/resource/8-619-0759?q=human%20trafficking%20policy#null)

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

If we discover a violation of our Anti-Slavery Policy we will respond in a manner proportionate to the nature and extent of the violation. Serious violations will require immediate and decisive action and may result in the termination of the business relationship. For less serious violations, we will allow the supplier reasonable time to develop and implement a plan for remediation. We will treat termination as a last resort as it is unlikely to resolve the underlying issue and it may be detrimental to those people who rely on the work to survive.