

Modern Day Slavery Act Statement

We are aware that slavery, servitude, forced labour and human trafficking is a growing issue. We are totally opposed to slavery and human trafficking in all aspects of our operations including our supply chain and recognise the need however small we perceive the risk to be proactive and alert.

Organisation's Structure

Goonvean Group (1)

Our Business

Our Group is a diverse industrial UK grouping primarily manufacturing supplying a range of global niche markets.

Our Supply Chains

We expect all our suppliers to participate in ethical trading audits, to provide employees with good working conditions, fair treatment and reasonable rates of pay. We expect workers' human rights to be respected and all applicable laws to be fully complied with.

Responsibility for Anti-Slavery Initiatives lies with the Group Managing Director.

Relevant Policies

We are committed to act with integrity in all our business dealings and to comply with existing legislation. We will not tolerate or condone any abuse of human rights and will take seriously any allegations. We operate a whistleblowing policy. Employment policies are detailed in our Staff Handbook and other communications provided from time to time.

Due Diligence Processes

As part of our initiative to identify and mitigate the risk of slavery and human trafficking in our supply chain we undertake the following due diligence processes:

Identify and assess potential risk areas in our supply chains.

Mitigate the risk of slavery and human trafficking occurring in our supply chains.

Monitor potential risk areas in our supply chains.

Protect whistle blowers.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values we include specific questions in our supplier audits.

Training

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 awareness training to existing and new staff.

Communication of Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Group's slavery and human trafficking statement for the financial year ending 30 September 2016. It is available on the Company's website and computer shared drive on individual company networks.

Signed



Jonathan Angilley
MD Goonvean Holdings Ltd

Date 26 January 2017

(1) Group Companies

Goonvean Holdings Ltd
Goonvean Fibres Ltd
Goonvean Ltd
Goonvean Aggregates Ltd
Clear-flow Ltd
Longcombe Labels Ltd
UK Converters Ltd
Wristbands UK Ltd
ND Thornley
North Devon Electronics Ltd
IML Labels & systems Ltd
Beachoption Ltd
Leed Marque Concepts Ltd
Francis Holdings (Totnes) Ltd
Foundry & Fabrication (Totnes) Ltd