

Harbour & Jones Ltd Modern Slavery Statement – 2016

This statement sets out Harbour & Jones Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. The organisation is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking.

Scope of Statement

This statement covers the activities of Harbour & Jones Ltd including all associated brands. The business brands are: Harbour and Jones, H&J Events, H&J Upfront Services, Fare of London and Principals Schools.

Harbour & Jones has a diverse supply chain, sourcing primarily UK produce.

Zero tolerance

The Company recognizes that modern slavery is a crime that can take many forms such as: slavery, servitude, forced labour, compulsory labour and human trafficking. Harbour & Jones Ltd. has a zero-tolerance approach to modern slavery. This applies to its own businesses as well as its dealings with other organisations.

Suppliers

Harbour & Jones Ltd. Is committed to working with its suppliers to build greater transparency within its supply chain. The Company itself commits to acting ethically and expects the same from those with whom the Company does business. As part of its contracting processes the Company requires its suppliers to commit to comply with all applicable laws and regulations. This includes applying the principles of the E.T.I (Ethical Trading Initiative) and relevant International Labour Organisations standards and conventions.

The Company, where required, conducts an appropriate level of due diligence on its suppliers.

Internal

Harbour & Jones Ltd. has strict HR policies, procedures and standards which fully support the Modern Slavery Act 2015 this includes the checking and auditing of all right to work documentation and contracts. The Modern Slavery act and the company's approach to that is outlined in the organisation's HR Guide for managers, within the recruitment and selection section. Modern Slavery is also specifically referred to in our whistleblowing policy for all staff to see and referenced in the staff handbook. These documents are available in the Company's IT system for document sharing. Updates are also communicated via e-mail to all managers and our monthly news bulletins which are available for all staff to view.

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Reporting

Harbour & Jones Ltd. encourages its employees to report any activity they believe to be unlawful and/or in breach of the Company's policies and standards. The Company's Whistleblowing Policy is available to its entire staff through the company's IT system for document sharing.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- Modern Slavery Update: The Board of Directors are responsible for ensuring the statement is up to date, and accurately
 reflects the organisation's actions and initiative to tackle slavery and human trafficking;
- Training: The People & Development team is responsible for ensuring the information is cascaded throughout the organisation, raising awareness for Modern Slavery Modern Slavery is included in recruitment and selection training and forms part of induction training for new managers through the HR Guide.

Awareness-raising programme As well as training staff, the organisation has raised awareness of modern slavery issues by distributing flyers to staff, putting up notices across the organisation's premises and circulating a series of emails to staff.

The flyers/notices/emails explain to staff the basic principles of the Modern Slavery Act 2015, what employees can do to report potential slavery or human trafficking issues to the relevant parties within the organisation and in addition what external help is available, for example through the Modern Slavery Helpline.

Approval

This statement has been considered and approved by the Company's Board of Directors.

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July 2016

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