

William Gibbons & Sons Ltd
Modern Slavery and Human Trafficking Statement
March 2019

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

The statement sets down William Gibbons & Sons Ltd's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of William Gibbons & Sons Ltd which are as follows:

William Gibbons and Sons are and always have been a Wolverhampton based company. We specialise in high quality colour magazines and promotional print and everything is designed to ensure a superb product for our customers.

The company was formed in 1872 by Mr William Gibbons and was incorporated in 1911. We have always been based in Wolverhampton and were originally based on Princes Street in the heart of the city centre. In 1972 we moved to Centenary House on the Wednesfield Road and were primarily a sheet fed printers. Around the same time we bought a local company, Barford and Newitt and traded as Gibbons Barford. In 1984, as business needs grew, we acquired our current site on Planetary Road with the full sheet fed side of the business joining from Centenary House in 1988. We now occupy twelve units and are a key local employer in the Wednesfield area employing around 550 staff from the local community.

The Company does not normally operate outside the UK and does not operate in countries considered high risk for slavery and human trafficking.

Our supply chains include the sourcing of raw materials principally related to the provision of paper, inks and other consumable products.

Risk Area Assessment and Controls

With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

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

- 1.1 Policies: the senior management team is responsible for creating and reviewing policies. The process by which policies are developed includes looking at best practice and adapting to the needs of the Company.
- 1.2 Risk assessments: The Health and Safety Manager is responsible for risk assessments in respect of human rights and modern slavery.
- 1.3 Due diligence: the senior management team is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company communicates the ETI Base Code (Ethical Trading Initiative) to all employees through induction training.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Ethics policy** - the Company ethics policy embraces the Ethical Trading Initiative (ETI) Base Code and covers areas such as freedom of association and forced labour.
- 2.3 **Environmental Policy** - The Company's environmental policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier.

Performance indicators

The Company uses key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including e.g. labour monitoring and payroll systems.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The senior management team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Mark Gibbons

Position: Joint Managing Director

Date: April 2019

Signature:

