

# GILES W. PRITCHARD-GORDON & CO. LTD

Slaugham Park, Slaugham, Sussex RH17 6AH  
Telephone: +44 (0)1444 400000 Facsimile: +44 (0)1444 401150



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It outlines the steps taken by Giles W. Pritchard-Gordon & Co Ltd and its subsidiary companies including Pritchard-Gordon Tankers Ltd (the Group) to prevent Slavery and Human Trafficking in its business and supply chains for the financial year ending 30<sup>th</sup> June 2018.

### Our Position

The Group conducts its operations ethically in terms of all business dealings and relationships, and its reputation is built on the core values of safety, transparency and honesty. The Group has a zero tolerance approach to Modern Slavery and Human Trafficking, and recognises and acknowledges its responsibilities to address and to mitigate the risk of such activities within its global operations.

### Organisational Structure and Supply Chain

The Group is a ship owner and provider of ship management and maritime services to a fleet of vessels. We also through subsidiary companies own and manage agricultural enterprises. Our business is global. The Group obtains a variety of goods and services from global suppliers. Our aim is always to maintain a competitive, reliable and sustainable supply chain wherever we operate. In dealing with our suppliers, the Group endeavours always to act in an ethical and socially responsible manner.

### Relevant Policies and Actions

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.

**Anti-slavery policy:** This policy confirms our zero tolerance approach to modern slavery and confirms that the Group would terminate its relationships with individuals or organisations working on our behalf if they are found to be in breach of this policy.

**Ethical policy:** This policy commits the Group to practise responsible corporate behaviour. It is a wide ranging policy that seeks to protect and promote the human rights and basic freedoms of all employees and agents whose work contributes to the success of the Group.

**Code of conduct:** The code of conduct has been adopted by all Giles W. Pritchard-Gordon & Co Ltd

Group Companies and makes clear the actions and behaviours expected by all employees when representing the Group.

**Whistleblower Policy:** The Group encourages all its employees, customers and other business partners to report any concerns relating to its direct activities or its supply chain.

The Group's recruitment procedures include screening processes to confirm eligibility to work in order to protect against Modern Slavery and Human Trafficking. All employees working in the maritime sectors are subject to adherence to the Maritime Labour Convention (MLC) 2006 standards for conditions of employment.

As a Group we work closely with our supply chain to ensure compliance with legislative obligations and we expect those organisations to have suitable anti-slavery and human trafficking policies and processes.

All employees of the Group have received a copy of the Group's Code of Conduct and Anti-Bribery Policy. Both policies outline the expectation that employees will conduct business with the highest integrity and respect for the interests of those with whom it has relationships.

#### Responsibility

The Giles W. Pritchard-Gordon & Co Ltd Board has overall responsibility for ensuring legal and ethical obligations relating to Modern Slavery and Human Trafficking are met, and that all those under the Group's control comply.

The Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Giles W. Pritchard-Gordon & Co Ltd Board of Directors endorses this policy statement and is fully committed to its implementation.



Rory Aird  
Director  
Date: 06/11/2018