

Introduction

Slavery and Human Trafficking are growing and often hidden issues in our society. James Hall and Company takes its responsibility in minimising such issues very seriously. We employ a zero tolerance approach to modern slavery issues within the course of our businesses, including internal processes, the processes of those who we contract with and ultimately those within the wider supply chain.

Group Overview

James Hall & Co. Ltd. is a Lancashire-based family business which was founded in Southport in 1863. We are primarily a wholesaler and distributor for SPAR, serving over 600 stores in the North of England. Currently, we are one of the county's largest employers, with more than 800 staff at our head office as well as those employed across our three food manufacturing sites and 151 retail stores. We also use agency labour for short term staff shortages, which are sourced through reputable recruitment agencies.

Our Divisions

Our principal function is the wholesale and distribution of food and drink. However, our other divisions involve the manufacture of food products, wholesale of non-food items and retail division. Our group of companies include the following trading entities: James Hall & Company Limited (our Wholesale and Retail Divisions), James Hall & Company (Properties) Limited, Clayton Park Bakery Limited, The Great Northern Sandwich Company Limited, Fazila Foods Limited, G & E Murgatroyd Limited, Graham Eyes High Class Butchers Ltd, North East Convenience Stores, G.A.P. Convenience Distribution Limited and James Hall and Company (Holdings) Limited.

Our Supply Chains

Our supply chains include the sourcing of materials, predominantly, but not exclusively relating to food and drink. We monitor our direct supply chain and have concluded that the risks of modern slavery and human trafficking are low. However, we acknowledge that we must remain vigilant to the risks and ensure that our suppliers understand and play their part in ensuring that modern slavery and human trafficking does not take place in our supply chains. It is intended to carry out a review of the supply chain in the near future to ensure that suppliers are following the guidance and that they continue to have policies in place that mirror our ethos.

Our Policies

Our family ethos underpins the company's outlook in respect of Modern Slavery and our commitment to complying with ethical practices. We expect our values and zero tolerance approach to be maintained throughout our supply chains to ensure that slavery and human trafficking is not taking place at any level.

Our Modern Slavery statement is available to staff and provided to contractors and suppliers as part of our due diligence, annual updates and training.

We intend to continue to review the steps we take when engaging with new suppliers, contractors and business partners to ensure that they are aware of and will adhere to our supplier conditions and warranties.

Due Diligence/Risk Assessment

All new suppliers are requested to sign our supplier warranty which sets out our expectations in respect of modern slavery issues. Our internal processes require new suppliers to be approved by our Quality Department before being signed off by a Director.

We are also in the process of reviewing our supplier warranty and existing policies and if required, we will make amendments to recognise our obligations under the Act to ensure compliance.

We review the responses from our suppliers to judge future actions and assess what further due diligence or other steps are required.

In relation to food products, where possible we deal with food safety accredited suppliers. However additional due diligence is exercised if a supplier does not hold a recognised food safety accreditation and particularly in the manufacture of food products. This will include site visits where appropriate.

We aim to establish long-term business relationships with local suppliers so that they are aware of our values and expectations and we have a working knowledge of their processes and compliance.

When dealing with large national/multi-national companies, we expect the same commitment to anti-slavery practices including a satisfactory Modern Slavery statement and supply chain due diligence.

Given the organisations that we work with and the existing checks and balances that we apply in these areas, we have concluded that the risks of modern slavery are low in this area.

Training

To minimise the risks of slavery and human trafficking in our supply chains, we aim to give training, where necessary to all relevant members of staff. This is to be renewed/updated on an annual basis.

Measuring Effectiveness

In order to monitor the effectiveness of the steps we have taken to stop slavery and trafficking taking place in our business and supply chains, we will use the following performance indicators for the financial year ahead:

- We will review and continue to communicate our policies to our workforce setting out our stance in relation to modern slavery.
- We will aim to establish a more detailed process to gain a better oversight of our direct supply chain, to aid risk assessment to provide better due diligence. Any concerns will be raised with the suppliers in relation to modern slavery issues.
- As part of a wider review, a review of the supplier conditions will be carried out to ensure knowledge of the current policies and standards.
- We will ensure that we continue to review and revise our anti-slavery and human trafficking clauses in our contracts with our suppliers.

As we develop our risk assessment and due diligence processes, we will assess and consider the appropriateness of developing further measures, where we assess that there may be a heightened risk of slavery and trafficking within those organisations.

This statement is made pursuant to s.54 (1) of the Modern Slavery Act 2015 and constitutes the James Hall group of companies' Modern Slavery and Human Trafficking statement for 2020-2021.

This statement has been approved on behalf of the James Hall Group of Company's on 21st September 2020

Statement Approved by Christopher Collins, Company Secretary.

A handwritten signature in black ink, appearing to read 'C. Collins', written in a cursive style.

21st September 2020

