

MODERN SLAVERY STATEMENT

ORGANISATION

This statement applies to Solent Clams Ltd. The information included in the statement refers to the financial year 2020.

ORGANISATIONAL STRUCTURE

Solent Clams Ltd is a small local business operating in Farlington, Hampshire.

We are based in an Industrial Estate, where we have our office, depuration centre and fishmonger wholesale and retail outlet.

The business is divided into 2 departments, the live shellfish, the wholesale and retail.

The live shellfish consist in buying from local fishermen and sell them throughout our departments, mainly to our customers in Billingsgate and some others customers who supply the Royal household.

Our Retail and wholesale department consists in supplying the general public and our catering customers and nursing homes.

The labour supplied to Solent Clams Ltd in pursuance of its operation is carried out only in one location, and it is Portsmouth, Hampshire.

DEFINITIONS

Solent Clams Ltd considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

Solent Clams Ltd acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Solent Clams Ltd understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Solent Clams Ltd does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Solent Clams Ltd in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Solent Clams Ltd strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

SUPPLY CHAINS

In order to fulfil its activities, Solent Clams Ltd main supply chains include those related to United Kingdom.

POTENTIAL EXPOSURE

Solent Clams Ltd considers that potential exposure is minimal in our business.

In general, Solent Clams Ltd considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods or services to it.

STEPS

Solent Clams Ltd carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Solent Clams Ltd has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

Solent Clams Ltd has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in Solent Clams Ltd or its supply chains.

In accordance with section 54(4) of the Modern Slavery Act 2015, Solent Clams Ltd has taken the following steps to ensure that modern slavery is not taking place:

- *Recruitment process is conducted with background checks*
- *Suppliers contract reviewed and judge in code of conduct and Modern slavery act statement.*
- *We have a firm position with Zero Tolerance policy towards modern slavery.*

POLICIES

Solent Clams Ltd has the following policies which further define its stance on modern slavery, we conduct background checks when recruiting, we only use reputable suppliers with a clear code of conduct regarding to modern slavery act and we review our policy every year when reviewing suppliers.

TRAINING

All our staff is aware about our policy regarding to modern slavery when being introduced to the business. Solent Clams provides following up training to staff and is effectively implement its stance on modern slavery.

SLAVERY COMPLIANCE OFFICER

Solent Clams Ltd has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to Solent Clams Ltd obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed

Duarte Goncalves

Date of approval

4th October 2019