



Gold Line Investments Group Limited

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial year ended 30.04.21

Introduction

This statement is made pursuant to section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that the Gold Line Feeds group of Companies have taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business.

Definitions

We consider 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 including confiscation of identification documents
- being physically constrained or to have restriction placed on freedom of movement
- being constrained or have restrictions placed on freedom of association
- use of worker paid recruitment fees and compulsory overtime

Our Organisation's Structure

A group structure under the parent company Gold Line Investments Limited which became the holding company for this group in December 2020 – previously the holding company being GLF Group Limited (formerly called Dodson & Horrell Group Limited). The Group contains two main trading companies Gold Line Feeds Limited (formerly Dodson & Horrell Limited), and Trophy Pet Foods (Trophy) and our head office is in the UK and all our trading Group Companies are in the UK.

The group under the holding company Gold Line Investments Group Limited had an annual turnover in the financial year ended 31.10.19 of in excess of £34,000,000.

Our Businesses

Our main trading companies are:

- **Gold Line Feeds Limited (formerly Dodson & Horrell Limited)**

Established in 1939 supplying traditional livestock and poultry feeds to farms and smallholdings. The company manufactured these feeds in Northamptonshire; initially at its mill in Ringstead before adding a second site at Islip. Over the years it expanded its product portfolio to provide quality nutrition for a diverse range of species with significant equine and canine brands, contract

manufacture of pet foods and a range of diets for a wide range of domestic, commercial and zoo animals. In December 2020 the company sold its equine, poultry and zoo business retaining the canine and small animal portfolio's and adopting the new name Gold Line Feeds. We continue to supply nationwide and worldwide with our branded and contract manufactured products.

○ **Trophy Pet Foods Limited**

Trophy Pet Foods has been established since the early 1990's, the first mobile pet food franchise in the UK. Since its conception, the company has been the market leader in its field and now has an exceptional team of franchisees. It is a nationwide company with the knowledge, experience and know-how to make each of its franchisees successful. Trophy trains, supports and guides franchisees develop and grow their own local pet food businesses selling the Trophy brand which is, manufactured and dispatched to franchisees from our Islip plant

Supply Chain Overview

Our Group Companies have various supply chains which can at their most complicated involve multiple levels of suppliers in the case of engineering supplies procured for our engineering department or a very simple supplier relationship where for the purchase of raw materials such as grain direct from local farmers.

The wide range of suppliers and the breadth and depth of parts of the supply chain make it challenging to effectively manage all suppliers policies towards human rights and environmental issues and therefore, the Group insist that this is the ultimate responsibility of any supplier who wishes to carry out business with the Group.

Our Policies on Slavery and Human Trafficking

Commitment

We acknowledges our responsibility in relation to tackling modern slavery and commit to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, our supply chains. We does not enter into business with any other organisation — in the UK or abroad — which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

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

Our Supplier Code of Conduct and Corporate and Social Responsibility Policy reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains

Potential exposure

We consider our main exposure to the risk of slavery and human trafficking to exist in the area of supply of raw material from countries where the provision of labour against breaches of human rights may be limited. In general, we consider our exposure to slavery/human trafficking to be relatively limited

Due Diligence Processes for Slavery and Human Trafficking

- Terms and conditions of purchase forbid the use of forced labour, child labour and physically abusive disciplinary practices by any of our suppliers.
- All direct suppliers are provided with our Supplier Code of Conduct
- Wherever possible we will use suppliers with an industry quality accreditation.
- Wherever possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour.
- Where we use national or international supply chains, our point 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. We expect each entity in the chain to, at least, adopt 'one-up' due diligence on the next link in the chain as is not practical for us (and every other participant in the supply chain) to have a direct relationship with all links in the supply chain.

Supplier Compliance with our Values

The Group has zero tolerance to slavery and human trafficking. We expect all those in our supply chains to comply with our values. Each the board of directors of each trading company is responsible for compliance and for monitoring and reviewing their supplier relationships. Group compliance is monitored by the board of directors of Gold Line Investments Group Limited.

Training

All relevant members of staff including all trading company directors are provided with training to ensure that there is a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

Monitoring our effectiveness in combating Slavery and Human Trafficking

We conduct supplier audits and in the case of feedstuff raw material suppliers require the completion of annual supplier questionnaires. Our purchasing departments ensure that there is a level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations

We have adopted KPI's in relation to Modern Slavery which are monitored annually.

The board of directors of each Group Company delegated approval of this statement on their behalf to the CEO of Gold Line Investments Group Limited and this constitutes our Group's slavery and human trafficking statement for the financial year ended 31st April 2021

Anna Horrell
CEO
Gold Line Investments Group Limited

Dated: December 2021