

# MODERN SLAVERY STATEMENT

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## A) ORGANISATION

This statement applies to Valley Northern Limited (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2021.

## B) ORGANISATIONAL STRUCTURE

Valley Northern is a limited company with its head office in Stafford and sub-offices in Taunton, Brackley and Bridgwater. The company is managed by the directors who are based in the Stafford head office and who are committed to looking after their employees properly.

The company is a wholesale company, selling Pharmaceutical Packaging products and Medical Disposables to the Pharmaceutical and Medical trade. Sales are made via the website, telephone, email, post and fax. Demand is fairly consistent through the year with winter months traditionally being slightly busier.

The labour supplied to Valley Northern Ltd in pursuance of its operation is carried out in the above offices and the warehouse at Stafford. Some packing work may be outsourced to packers but all direct labour is based in the UK at present

## C) DEFINITIONS

Valley Northern 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.

## D) COMMITMENT

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

Valley Northern 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 the Valley Northern Ltd in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Valley Northern Ltd strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

## E) SUPPLY CHAINS

In order to fulfil its activities, Valley Northern Ltd's main supply chains include those related to supply from UK, Europe and Globally. We understand that the Valley Northern Ltd first-tier suppliers are sometimes intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

## F) POTENTIAL EXPOSURE

Valley Northern Ltd] considers its main exposure to the risk of slavery and human trafficking to exist in countries like China so we avoid buying from this country as far as possible.

In general, the Valley Northern 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 and/or services to it.

## **G) IMPACT OF COVID-19**

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for Valley Northern Ltd as it did for others across the nation.

Valley Northern Ltd is aware the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

However, despite the permitted delay, Valley Northern Ltd remains in a position to publish its statement for the financial year 2021 improving on the original publishing requirements as in actual fact Valley Northern Ltd is not required to publish anything on this as currently being below the threshold of £36 million.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

Valley Northern Ltd modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

## **H) STEPS**

Valley Northern 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.

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

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

We have reviewed our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;

We have measures in place to identify and assess the potential risks in our supply chains;

We are undertaking impact assessments of its services upon potential instances of slavery;

We have created action plans to address risk to modern slavery;

To embed a zero tolerance policy towards modern slavery we have sent this to our suppliers.

## **I) KEY PERFORMANCE INDICATORS**

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

- Keeping a record of any known cases.

## **J) POLICIES**

Valley Northern Ltd has the following policies which further define its stance on modern slavery

- Equal opportunity policy within our employment handbook
- Recruitment Policy within our employment handbook

## **K) TRAINING**


Valley Northern Ltd provides the following training to staff to effectively implement its stance on modern slavery our recruitment policy and equality policy is given to all new members of staff upon arrival. Our culture has 'Kind and True' as a key core value which is conveyed in meetings, and is on very prominent graphics on the walls of our head office, is on website and promotional material..

## **L) SLAVERY COMPLIANCE OFFICER**

Valley Northern 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 the Valley Northern 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.

**Date of approval**      **09.08.2021**

**Signed**.....

**Managing Director**

**Date**    **09.08.2021**

