

Modern Slavery Act Statement - January 2021

Our business

As a leading manufacturer and distributor of Fertilisers to the Agriculture sector throughout Northern Ireland, we produce a comprehensive range of NPK, prescription blends, straights and micro-nutrient products. In addition to commodity Fertilisers, the company is committed to developing innovative and technologically enhanced crop nutrition products and services with the objective of improving crop yields, crop quality and farmer returns.

Our ethical standards

Independent Fertilisers Ltd (Trading as Goulding NI) is committed to conducting itself with the highest ethical and legal standards. We ensure that the operations within the business and its supply chain meet those standards at all times and are compliant with the Modern Slavery Act 2015.

We are aware that Human traffickers and illegal / unlicensed gang-masters target a range of industries including those involved in the Agricultural sector. It remains important therefore that we maintain our vigilance and continually improve our controls and procedures.

Our MSA processes, controls and measures

We recognise that continuous improvement is important and we closely monitor UK government guidance, updates and requirements. During the period since our last statement and despite the COVID-19 pandemic, Independent Fertilisers has put in place a number of actions, including the following:

- Implemented new e-learning training on Modern Slavery for all employees of Independent Fertilisers to improve general awareness and understanding of the risks.
- Implemented a new supplier compliance check process requiring new and existing suppliers to read and accept our stance in relation to preventing Modern Slavery.
- Development of a new internal Modern Slavery Policy, outlining our response to the MSA Act of 2015, including detail of current procedures that we have in place.
- We have created an MSA Steering group, comprising of senior HR, Operations and Finance representatives to meet on a regular basis to implement and develop MSA controls and procedures.

The pandemic

We are acutely aware that the COVID-19 pandemic brought increased risk to Modern Slavery in some industries and some organisations within the Agricultural sector. We understand that the situation

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changes frequently and the effect of consumers stockpiling certain goods and the general impact on the food sector supply chain, which needs to be increasingly agile, adapting to unforeseen shocks. This suggests that changes may be needed, to make the supply chain in the food sector more resilient (source: [UK Parliament](#)). Whilst we continue to monitor indications affecting our industry, we can confirm that to date:

- Independent Fertilisers' own recruitment and staffing demand has been stable throughout the pandemic.
- Independent Fertilisers fully supported its own employees with COVID-19 support, being more flexible regarding working hours, working practices, working from home and offering wellbeing advice. All sites were fully risk-assessed as required with regular briefings to all employees on covid controls and measures in place, with the provision of PPE to ensure all workplaces are covid-19 secure.
- There have been no indications or evidence to suggest that our supply chain has suffered from an increased risk of Modern Slavery.
- Payment of suppliers has not suffered as a result of the COVID-19 pandemic with our usual supplier invoices being paid on time and in full.

Other existing procedures

- Independent Fertilisers also gives an opportunity for all employees to identify risks anonymously through its Whistleblowing process, which is detailed on notice boards on all sites and on the shared network drive. New starters also receive relevant information upon joining the Company within their new starter pack, to raise awareness of modern slavery, human trafficking and the whistleblowing procedure.
- We continue our internal 'risk checks' to ensure that any permanent or seasonal employment (within our workforce) does not contravene our own ethical standards or any legislation or government guidance.
- We will promptly answer questions posed by our customers in respect of the Modern Slavery Act who wish to know more about our operations and / or our supply chain.

Our supply chain

We are a manufacturer and distributor and our supply chain is global in its reach. We source from manufacturers directly or through intermediaries. Many of our suppliers are large in scale with deemed low-risk of non-compliance to the Modern Slavery Act, however, as a Company we remain vigilant to all risks, particularly in small-scale businesses in whose sector there may sometimes be a higher risk of unlicensed manual, seasonal labour.

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Independent Fertilisers is committed to ensuring our supply chain is free from human rights abuses. We actively welcome comments and suggestions from anyone within our supply chain about how we can improve our operations or further reduce any risks in our supply chain. If you have any questions regarding this issue please contact us at: <https://www.gouldings.ie/ni/contact-us/enquiry-form/>

William Barnett
Director



Liam Larkin
Director



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