

TEMPEST

PHOTOGRAPHY

Nationwide Portrait and Group Photographers

H Tempest Ltd

Modern Slavery Statement for the Financial Year 2019

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that H Tempest Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business operations or our supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. H Tempest Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

H Tempest Limited operates predominantly in the academic and military photographic markets of the UK, with additional business activities focussed on academic robe production, photographic frame manufacture and retail of such services around the UK.

H Tempest Limited source and produce most the materials associated with its operations in the UK with a small number of product line components coming from our manufacturing partners in China with whom we maintain a close working relationship.

Our high-risk areas

In regular assessment and monitoring of our business operations it is of paramount importance that we systematically consider our wider business and assess possible high-risk areas to ensure that they are free from slavery, servitude, human trafficking and forced labour.

The area of our business which warrants the greatest contemplation is our involvement with other suppliers, including those who operate outside of the UK. We must be diligent in assessing the operations of all the international suppliers we engage with. In the provision of robe production, we operate with suppliers in China and have taken steps to ensure that the conditions of staff working for the supplier are fair and in line with our commitment to anti-slavery measures. In view of this commitment we have taken the opportunity to travel to China to meet the suppliers and inspect the production process and working conditions ahead of commissioning any work.

Our policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include:

1. Modern Slavery Policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment Policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.



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Directors: B.H.Dodge (Chairman) M.C. Barton (Managing) T.Tempest B.R.J.Tempest B.Buck F.C.A (Finance) R.Tempest (Sales)
Registered in England No. 374510 Registered Office: The Colour Laboratory, St Ives, Cornwall, TR26 3HU · VAT No. 131710513.

3. Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers

H Tempest operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery and on-site audits which include a review of working conditions in instances where we perceive a higher risk. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our procurement/buying teams so they understand the signs of exploitation.

Our performance indicators

We use the following to monitor the effectiveness of our policy.

1. Number of reports received from employees.
2. Number of approaches from the public.
3. Reports by law enforcement agencies to indicate that modern slavery practices have been identified.
4. Employee engagement.

Declaration of Reporting to date for 2018

Using our continuous proactive approach to assess our business activities and those of businesses within our supply chain, we are happy to report that in review of our 2018 business activities, we received no reports of any nature relating to Modern Slavery, forced labour or human trafficking.

We will continue to be diligent in identifying and tackling any issues within the course of our business and to respond swiftly and pro-actively to any reports of such behaviours within our business.

The current reporting period for 2019 will run from 31st March 2019 until 30th March 2020.

Approval of this statement

This statement was approved by the Board of Directors on 26th March 2019.

Signed:



Bryan Buck (Finance Director)
H Tempest Limited

Date: 26th March 2019