

## **Golden Charter Limited**

### **Slavery and human trafficking statement 2017/18**

1. Golden Charter Limited (“Golden Charter”) is a leading provider of prepaid funeral plans in the United Kingdom.

2. We engage with a large number of private sector businesses and organisations as product and service providers, sub-contractors and introducers in pursuit of our business activities. Our activities are undertaken at arms-length and take place almost exclusively in the United Kingdom although we do a modest amount of business in the Republic of Ireland.

#### **Supply chain policy**

3. Our procurement activities take place in the United Kingdom and our contractors and suppliers are almost exclusively UK based.

4. We expect our contractors and suppliers and other companies we engage with to ensure their goods, materials and labour-related supply chains:

- Fully comply with the Modern Slavery Act 2015; and are
- Transparent, accountable and auditable; and are
- Free from ethical ambiguities.

5. Individuals with evidence of non-compliance with the Modern Slavery Act in connection with our supply chains will be encouraged to follow the reporting procedures outlined within our Whistleblowing Policy which applies to all those who work for us; whether full-time, part-time, employed through an agency or contractor, or use any appropriate internal reporting mechanisms.

#### **Steps taken by us since 31 March 2017 – Year 2**

##### **(A) Management responsibility and general awareness**

We have:

- Agreed continued management responsibility for this policy and statement and received unanimous endorsement from our Management Team and our Board.
- Raised awareness among organisations we contract with.

##### **(B) Risk assessment**

We have:

- Reviewed our existing risk assessment to determine our risk exposure. We have concluded that there are no parts of our business and supply chains where there is a significant risk of slavery and human trafficking taking place.
- Included the Modern Slavery Act 2015 within our risk register to ensure any risk is flagged, assessed and appropriately addressed.

### **(C) Risk mitigation**

We have:

- Enhanced our contracts with Introducers and suppliers to impose compliance with the Modern Slavery Act and the ability to terminate in the event of non-compliance.

We intend:

- Not to contract with any organisation convicted of an offence under the Modern Slavery Act 2015.
- Where considered necessary or desirable, to seek to impose in new contracts that we enter into provisions for termination in the event of a modern slavery or human trafficking compliance breach by the other party.

### **Steps to take**

#### **(A) Management responsibility and general awareness**

We will:

- Raise awareness of this published statement by notifying organisations with which we regularly engage.

#### **(B) Risk assessment**

We will:

- Review this policy against our activities to establish whether the approach we have taken follows emerging best practice by:
- Assess and interpret any recent or emerging case law and best practice;
- Benchmark our activities against statements and action plans undertaken by similar private organisations; and
- Re-evaluate the risk of non-compliance as part of our cyclical Compliance Risk Register assessment.

#### **(C) Risk mitigation**

We will:

- Act promptly where a compliance breach has been identified or flagged.
- Continue to feed-back lessons learnt into the compliance risk management process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Golden Charter Limited's slavery and human trafficking statement for the financial year ending 31 March 2018.



**Suzanne Grahame, CEO**  
**Golden Charter Limited**  
**August 2018**