



Modern slavery statement for financial year - 2018

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that Comex-Mckinnon has taken and is continuing to take to ensure that modern slavery is not taking place within our business activities or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Comex-Mckinnon 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

Comex-Mckinnon has been supplying the Irish feed industry with grain and feed ingredients since 1982.

Our policies

We operate a number of internal policies with relevant training to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about practices within our business or supply chain, without fear of reprisals.
3. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers

We conduct due diligence on all suppliers. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery or human trafficking.

Training

We conduct training for our procurement/shipping/trading teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, media or law enforcement agencies to indicate that modern slavery practices have been identified.

Rory Donnelly
Managing Director
Comex-Mckinnon Ltd
10th July 2018