



INFINITE POSSIBILITIES.  
ONE FAMILY.

Document Reference:	UK-PL-014a	Internal Section:	7	Author:	Maxine Brooks
Version Number:	3	Date of Issue:	08 <sup>th</sup> September 2021	Approved By:	Hazel Tomkinson

## Modern Slavery Statement

### Introduction

This statement sets out the actions that Rich Products Ltd has taken to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year [1 January 2020 to 31 December 2020].

Rich Products Ltd recognises that it has a responsibility to take a robust approach to preventing slavery and human trafficking and is committed to constantly reviewing and improving its practices.

Rich Products Ltd is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### COVID-19

As we report on these actions for the financial year of 2020, we are increasingly mindful of the global challenges presented by COVID-19 and the expected longer-term challenges this unprecedented event will bring to our business, suppliers, and associates. Now, more than ever, we remain committed to doing the right thing as a business. This includes continuing to build on the foundations laid by the Modern Slavery Act to improve and adapt our business processes, policies and risk identification and mitigation.

At the end of this report we have outlined and demonstrated how we have responded and temporarily adapted our activities and priorities during the COVID-19 Pandemic as to monitor our risks of modern slavery within our operations and supply chains whilst maintaining the health and safety of our associates.

### Organisational structure

This statement covers the activities of Rich Products Ltd. Rich Products Ltd supply sweet goods to a diverse range of customers, from leading coffee shop chains to renowned department stores and well-known supermarkets. Rich Products Ltd is registered in England (registered number 1847615).

### Supply Chains

Supply chain security and integrity is a crucial component of our business model. Robust technical and traceability systems ensure that our products are responsibly sourced from suppliers whose values are aligned with our own. Every supplier is subject to a rigorous approval process where extensive checks are carried out, both technically and commercially to ensure that the supplier complies with all of our requirements before being approved. Ongoing checks are also carried out on a regular basis either via the use of our quarterly performance scorecard and/or technical audits.



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We work to influence suppliers' practices and where gross violations are uncovered; we would attempt to work with the supplier to correct it in the first instance. If it became apparent that the required improvement is not possible, then a review of the trading relationship would be undertaken.

As a business we use Labour Providers to supply a percentage of our workforce. Each Labour Provider is audited against our own Labour Provider audit standard every 6 months. Within these audits, the ETI Base Code and controls around Modern Slavery are reviewed.

We always monitor, assess, and mitigate the potential risk areas in our supply chains and have robust systems in place to deal with such risks. We provide Supplier Self Audit Questionnaires which include an Ethical Section as per below and have recently implemented the use of a software tool called Tracegains across our Supply base. This software allows us to determine when BRC and specifications are due for renewal in advance of the completion date.

Section 2.13 – Ethical	
Do you comply with the ethical trading initiative? See link: <a href="https://www.ethicaltrade.org/eti-base-code">https://www.ethicaltrade.org/eti-base-code</a>	YES / NO
Do you have an ethical policy?	YES / NO
Have you had an ethical audit?	YES / NO - Date:                      Result:
Are you a member of sedex?	YES / NO - Membership number:

## Responsibility

Responsibility for Rich Products Ltd.'s initiatives addressing slavery and human trafficking is as follows.

Responsibility for policies is;

- Human Resources – Director of Human Resources, Rich Products Ltd, for policies related to the prevention of slavery and human trafficking in our own operations.
- Managing Director of Rich Products Ltd, for the Code of Conduct/Ethics.
- Procurement – Head of Procurement, for ensuring the policies relating to the prevention of slavery and human trafficking in our supply chain are adhered to.

## Due Diligence and Mitigating Risk

In our own operations, the Human Resources team are responsible for ensuring that our company adhere to all employment laws in the due diligence checks undertaken during different stages of employment, from initial recruitment onward.

As part of our initiative to identify and mitigate risk we monitor ethical standards across the business on a regular basis both internally and via external third-party audits. Sites undergo unannounced SEDEX members Ethical Trade Audits every other year. This activity is also supported by our Ethical Trading Policy, our CSR Policy, our Equal Opportunities Policy, and our commitments to ensuring the safety of our associates.



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## Due Diligence of Suppliers Undertaking

Rich Products Ltd undertakes due diligence when considering its procurement arrangements, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- Conducting supplier audits or assessments through the company's own associates, which have a greater degree of focus on slavery and human trafficking where general risks are identified
- Suppliers are required to sign up to the company's code of conduct
- Any UK agency supplier must be registered with the Gangmaster Licencing Abuse Authority
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular including Stronger Together

## Relevant policies

Rich Products Ltd operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy.** Rich Products Ltd operates a Whistleblowing Policy which encourages all its associates, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Rich Products Ltd.'s whistleblowing procedure is designed to make it easy for associates to make disclosures, without fear of retaliation.
- **Code of conduct.** This code makes it clear to all associates and suppliers the actions and behaviours expected of them when representing Rich Products Ltd. Rich Products Ltd strives to maintain the highest standards of associate/supplier conduct and ethical behaviour when operating and managing its supply chain.
- **Supplier/Procurement Code of Conduct.** Rich Products Ltd is committed to ensuring that its suppliers adhere to the highest standards of ethics and are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Any suppliers we use are pre-qualified using our RFI and SAQ documents and are only approved to the next stage (RFQ or RFP) if they pass our commercial and technical checks. We integrate forced labour policies within our contract and new supplier completion forms through the use of legal clauses and assess and screen those suppliers via the use of our technical approval procedure.

As a minimum requirement, all new suppliers must have BRC Accreditation Grade A, pass our Dun and Bradstreet financial check and must agree to our terms and conditions.

Rich Products Ltd works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Agencies and suppliers are audited on a regular basis.



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- **Policy for Recruitment / Agency workers.** Rich Products Ltd operates a robust recruitment policy, including conducting eligibility to work in the UK checks for all associates to safeguard them against human trafficking or individuals being forced to work against their will. Rich Products Ltd will only use specified, reputable employment agencies which have been audited to source labour and always verifies the practices of any new agency it is using before accepting associates from that agency. Agencies are audited by HR every six months. In the event of any risk being identified in respect of any worker, they would be spoken in accordance with the advice provided by ‘Stronger Together’ and further advice would immediately be sought from the Gangmaster and Labour Abuse Authority if it were deemed to be necessary.
- **ETI Base Code/Ethical Trade Policy.** Rich Products Ltd complies with the Ethical Trading Initiative (ETI) Base Code and enforces its Ethical Trade policy. Rich Products Ltd recognises the importance of being aware of labour practices in its supply chain and the need to monitor, evaluate and act on information about our suppliers and their sub-contractors’ performance. Only agencies holding a GLA (Gangmaster Licensing Authority) license are used for the supply of temporary labour.

Rich Products is also registered with SEDEX (the largest collaborative platform for sharing ethical supply chain data).

- **Anti-Slavery Policy.** Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Training and awareness building

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide any required training to our staff and agency staff. Our HR team have attended the ‘Stronger Together – Tackling Modern Slavery in Supply Chains’ workshops.

All managers are responsible for ensuring that all associates of Rich Products Ltd are aware of the risks and signs of slavery and human trafficking, and of the company’s responsibilities under the Modern Slavery Act 2015.

### COVID 19 Responses

**Supporting suppliers** – During this time, to prioritise our engagement with suppliers, where feasible, we have been honouring all supplier orders that have been in the system and in the scenario of late cancellations or orders that are no longer required, we have worked with those suppliers to ensure that the business impact for them has been kept to a minimum. Throughout this time, we have also increased our contact and maintained proactive regular communications with our account managers to keep abreast of any potential forthcoming issues.



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Contracts have also been pushed out an extended where possible to accommodate any drops in demand and from a legal perspective we have been working on inserting a clause within our supply contracts so that we can protect ourselves as a business for any similar incidents that may occur in the future.

**Policies and procedures** – During this time, we continue to ensure that all our associates can access our policies and procedures with ease. Any adapted or new policies/procedures that are put in place are communicated to our associates as soon as possible can be found through the business intranet site or via a member of the People Support Team.

**Recruitment** - During this time, we are aware that any heightened demand may lead to vulnerable workers being exploited by third parties as a means to seek profit and so we continue to operate a robust recruitment policy/process and provide rigorous checks, including conducting eligibility for right to work in the UK, processing background checks and referencing for all new associates to safeguard them against human trafficking or individuals being forced to work against their will.

**Health and Safety of Workers and Emerging Risks** - Our Covid-19 risk assessment is reviewed on an ongoing basis to ensure we continue to minimise and prevent the spread of Coronavirus. All our risk assessments throughout the business are regularly reviewed to help us identify any emerging risks and consider which parts of the workforce may be particularly vulnerable. This approach has allowed us to react and mitigate these risks and avoid the spread of the virus amongst our associates through the following actions.

- Social Distancing Measures have been implemented throughout all our business premises involving the installation of new signage identifying clear 2m distancing
- All production associates have attended a full social distancing safety brief outlining the new PPE requirements and the new social distancing rules now in place.
- All associates undergo temperature checking upon arrival on site.
- All associates who are working onsite are provided with PPE, this includes being issued with a new face mask daily and also provided with their own full-face visor.
- Additional physical barriers have been installed where the 2m social distancing is difficult to maintain at all times
- The site is regularly deep cleaned by our own hygiene team
- Associates use different entrances/exits when changing over shifts to avoid any cross over and maintain the 2m social distancing rules
- Internal arrangements have already been executed i.e. increased awareness, promotion of good hygiene practices, posters, installation of new hand sanitisers dispensers etc. These are all measures we have taken within the workplace.
- Our office-based staff are currently operating on a working from home approach and any meetings that take place are done so online via video conferencing.





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- A new Return to Work safety plan will be delivered to all office workers when the Government guidance changes, and they are allowed back onto the site
- Associates are asked to self-isolate for 10 days when either themselves or a close family member presents any symptoms
- Colleagues returning from travel, either business or personal, are being asked to work from home for 10 days irrespective of symptoms
- Those who are in self-isolation will receive either full pay or Statutory Sick Pay (where in the probationary period) with the 3-day waiting period being waved.
- Our COVID 19 Steering Committee meet weekly to discuss the ongoing situation where the Board of Directors are kept updated on emerging or heightened risks in which the business needs to react to mitigate the risk and spread of the virus amongst workers further.
- We are also working closely with our supply chain to ensure that they have equivalent plans in place, with clear visibility of any potential impacts.

Outside of these arrangements we also adhere and react in accordance with COVID-19: guidance for employers and businesses – GOV.UK

### Approval for this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2020 and has been approved on the 08<sup>th</sup> September 2021 by Rich Products Ltd.'s Board of Directors, who review and update it annually.

### Managing Directors Signature (UK and EME Region):

**Managing Directors Name (UK and EME Region):** Hazel Tomkinson

**Date:** 08/09/2021