



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 2019 to 31 December 2019].

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.

Organisational structure

This statement covers the activities of Rich Products. 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.

As a company 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;

Section 2.13 – Ethical	
Do you comply with the ethical trading initiative? See link: https://www.ethicaltrade.org/eti-base-code	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 employees.

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.
- **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.

- **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.

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 2019 and has been approved on the 28th March 2019 by Rich Products Ltd.'s Board of Directors, who review and update it annually.

Managing Directors Signature:

A handwritten signature in black ink, appearing to read "David Hunt". The signature is written in a cursive style with a long, sweeping tail.

Managing Directors Name: David Hunt

Date: 28/03/2019