



## **RAGLETH LIMITED** **SLAVERY AND HUMAN TRAFFICKING POLICY, April 2018**

### **Introduction**

Ragleth Limited and its subsidiary companies wish to comply with the law concerning slavery and human trafficking. Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). This policy, pursuant to section 54 (1) of the Act, covers slavery, servitude, forced or compulsory labour and human trafficking. The Group recognises that identifying potential victims of slavery can be difficult as there is a spectrum of abuse. We recognise that we have a responsibility to ensure that workers are not being exploited and that they are safe and free.

We expect anyone who has or seeks to have, a business relationship with us and/or any member of our Group, to familiarise themselves with our slavery policy and to act at all times in a way which is consistent with our values.

We operate to a set of values which reflect our respectful and non-exploitative relationships with our principal stakeholder groups: customers, shareholders, suppliers and team members. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals. We oppose modern slavery in all its forms and we ask the same attitude of all with whom we have business dealings.

### **Definitions**

With Slavery the perpetrator acts as if he owns the person or victim and deprives them of their freedom.

Servitude and Forced Labour are obligations to provide services which are imposed by coercion.

Human trafficking occurs when a person arranges or facilitates the travel of another person with a view to that person being exploited.

### **Ragleth Group and its Subsidiary Companies**

We consider the risk of slavery, forced or compulsory labour or human trafficking in our own companies to be low: our businesses are all located in the EU. In the UK, passports of all employees are checked to ensure that they can be legally employed; all employees are employed under a contract of employment and are paid through a payroll with PAYE deducted. No employee of the Group is paid at rates of pay below the minimum wage. In Poland and Germany all colleagues are legally employed on appropriate rates of pay.

If there is Risk, it is possible in the case of bought-in supplies of certain labour-intensive food ingredients, and enquiries are made with our suppliers to confirm that fair labour practices are adopted.

### **Responsibility for the policy, and whistleblowing procedures**

The board of directors of the Company has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.

Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by colleagues, who should approach either the Company Secretary, or a senior manager or a director of the Company.

### **Review**

Following its initial adoption, this Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis and may be amended from time to time.