



Modern Slavery Statement

Introduction

Ringtons Limited (“The Company”) is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps the Company has taken in the financial year ending June 2019 to prevent modern slavery in our business and supply chains and those we are working to implement.

Our organisational structure, business and supply chains

The principal activities of the Company are:

- Sourcing, blending and packing of tea and infusion products for the Ringtons brand and a number of other customers;
- Sourcing, blending, roasting and packing of coffee for the Ringtons brand and a number of other customers;
- Sourcing gifts and other food or drink products to be sold under the Ringtons brand;
- Retailing products to:
 - UK retailers directly,
 - Businesses (out-of-home) directly,
 - Households directly via sales vans, primarily throughout north and central England.

Our policies relating to modern slavery

Our Modern Slavery Policy reflects our intention to act ethically and with integrity in all of our business activities and relationships and our commitment to fully comply with the UK Modern Slavery Act 2015: opposing modern slavery in all its forms and preventing it by whatever means we can.

We have implemented systems to encourage the reporting of concerns by the Company’s employees, including establishing a whistleblowing procedure for employees to report any concerns.

Our business and supply chains: due diligence, identifying & mitigating risks

We operate a modern slavery working group that covers all activities of the Company’s operations. The working group is following the Stronger Together risk assessment tool for

tackling modern slavery in global supply chains¹. As part of the working group we are assessing our supply base to better understand our suppliers' operations and help us to establish a baseline of conditions in our supply chains. Our risk assessment will allow us to identify risk areas. We will engage with suppliers to mitigate risk areas.

Our employees & agency labour

Our staff complete modern slavery training during the induction process. This includes information on signs to look out for. We only use approved and audited agency suppliers. We complete random and anonymous worker questionnaires to allow us to gain insight from our employees. These actions allow us to work together, to tackle worker exploitation.

Our suppliers

We maintain a record of our suppliers' modern slavery statements where they are available (particularly relevant to our UK-based suppliers). Informed by supplier self-assessment questionnaires, we conduct a risk assessment of our supply-base and operations to identify areas where modern slavery is most likely to occur. This will allow us to identify and remediate risks in our supply chains. This risk assessment will also inform our buying strategy.

UK Suppliers

These suppliers include (but are not exhaustive to) cleaning, maintenance, power, telecoms, post and IT. Many of these suppliers publish their own modern slavery statements, however others are less transparent. All are UK based and are therefore subject to UK labour law. Whilst this does not guarantee compliance, it does infer lower risk.

Non-UK Suppliers

Our tea:

We have longstanding relationships with our suppliers of tea, and work closely with them. Through direct communication we have greater control of our supply chains, and can better understand factors in our tea supply chains to recognise and mitigate risks.

We continue to foster long-term, ethical business relationships with our key suppliers and are committed to only buy from tea estates and producers that are participating in the Ethical Tea Partnership (ETP)² programme. The ETP monitors suppliers' performance against the ETI labour and human rights on tea estates.

Our herbs, spices, fruit & infusions:

We buy these ingredients from intermediary suppliers, which means we have less transparency than compared with our tea supply chains. We work with our suppliers to ensure that they have systems in place to assess and mitigate risk of modern slavery. We also utilise resources such as Freedom in the World Score³,

¹ Stronger Together (October 2017) 'Tackling Modern Slavery in Global Supply Chains Toolkit.' [Online] Available at: <https://www.stronger2gether.org/product/toolkit-for-global-supply-chains/>

² Ethical Tea Partnership [Online] Available at: <http://www.ethicalteapartnership.org/>

³ Freedom House [Online] Available at: <https://freedomhouse.org/report/freedom-world/freedom-world-2019>

Transparency International: Corruption Perception Index⁴, and The Global Slavery Index⁵ to look at country-level risk for the ingredients we are buying. This enables us to cross-check the highest-risk areas we source from.

Our targets

In the financial year 2019-2020 the Company will finalise our supply chain risk assessments and identify key supply chain risks. The Company will then strategically work with high-risk suppliers to address concerns.

If we were to find instances of modern slavery in our supply chains, we would work with our supplier to identify underlying causes and where possible remediate these. If a solution could not be sought, we would cease trading with the supplier. We would prioritise the victims of modern slavery and work to ensure that no further harm would come to the victims.

Our training on modern slavery available to our staff

We have trained and will continue to train all appropriate staff on the requirements of the Modern Slavery Act 2015 and how to recognise and deal with incidences of modern slavery.

External training workshops run by Stronger Together have been attended by members of multiple departments.



Simon M Smith
CEO
Ringtons Limited
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⁴ Transparency International [Online] Available at: <https://www.transparency.org/country>

⁵ Global Slavery Index [Online] Available at: <https://www.globalslaveryindex.org/2019/findings/foreword/>