


QMS – Group Policy Manual	
Modern Slavery and the Supply Chain	
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## **J.R Dalziel Ltd. (JRD) - Modern Slavery and Human Trafficking Policy Statement**

Slavery and Human Trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

### **The Organisation's Structure, its business and Supply chains**

JRD is made up of three divisions – Dalziel Ingredients Ltd, Dalziel Ltd and Rillatech and our supply chains are many and varied across many parts of the World.

JRD is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our individual business units.

### **Polices for slavery and human trafficking**

JRD has a zero-tolerance policy to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values which is being written into an Ethical Code of conduct for the business.

### **Due Diligence for slavery and human trafficking**

JRD is undertaking a process of risk assessment through use of the Global Slavery index to identify high risk countries of origin for our products and then identify mitigating processes to prevent both slavery and human trafficking.

As part of our initiative to identify and mitigate risk HR in combination with Mentor has in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Our supply chain providers are always with a UK provider and we expect these entities to provide JRD with evidence of these anti-slavery and human trafficking policies and processes.

To identify through the use of Horizon Scanning any issues related to Modern Slavery and Human Trafficking for products supplied from our divisions.

### **Current Identified Risks of Modern Slavery & Trafficking in JRD Supply Chains**

Through the use of Horizon Scanning and other Industry sources as a business we have deemed Spices and Herbs with country of origins outside of the UK and Westerns countries to be high risk.

The countries identified of concern such as Cuba, Iran, Syria, the Crimean Region of Ukraine, North Korea JRD will avoid purchasing items from these countries.

For the list of restricted countries in the Ethical Code of conduct we will ask directly for what measures are in place to prevent Modern Slavery and Human Trafficking.

### **Monitoring of our Supply Chain for Modern Slavery and Human Trafficking**

JRD is committed to putting together a Corporate level team covering Purchasing, HR, Technical, H&S Safety, Operations to agree relevant indicators and to review the outcome from Ethical code of conduct,

JRD currently uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Human resources in conjunction with the sites will conduct labour monitoring, right to work documentation and payroll audits
- The Purchasing teams will undertake a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations and instigate our Ethical and Corporate Responsibility document for our Supply Chain.
- The Technical department will regularly review policies from Ethical Policy (POL004) including ethical systems such as Sedex and associated codes of conduct, POL26 Product Authenticity & VACCP, Claims, TACCP and Chain of Custody Policy (POL026), through the Supplier approval system (TEC002) in the Supplier Audit Questionnaire and physical audit and our working practices which show our commitment
- Development of an Ethical and Corporate Responsibility document for our Supply Chain.

### **Training on Modern Slavery & Trafficking within our Organisation.**

Each site will be responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

Human resources in conjunction with the specific site will ensure employees receive an induction into the business where our policies, procedures and expectations are outlined.

### **Our effectiveness in combating slavery and human trafficking**

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement.



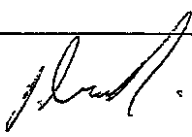
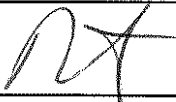


### Reporting suspicions of slavery

Employees can report any suspicions of slavery either through the Public Interest Disclosure (Whistleblowing) policy or externally to the Modern Slavery Helpline. Details are set out below:

<https://modernslavery.co.uk/contact.html>

0800 0121 700.

### The Policy will be reviewed on an annual basis to ensure the statement is up to date:

Signed By: Senior Site Manager		Date:
Signed By: HR Manager		Date: 05/10/20
Signed By: Group Technical Manager		Date: 09/10/20
Signed By: Managing Director		Date: 21/9/20
Signed By: Chairman		Date: 22/9/20