


QMS – Group Policy Manual	
Modern Slavery & Human Trafficking Statement 2023	
Date: 06/06/2023	Issue: 05
Document No: POL033	Pages: 2
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J.R. Dalziel Ltd. (JRD) - Modern Slavery and Human Trafficking Policy Statement

J.R. Dalziel Ltd recognises Modern Slavery and Human Trafficking as a hidden blight on our global society and acknowledges responsibility to actively pursue its prevention.

The Organisation's Structure, its Business and Relationships

JRD is made up of 3 divisions – Dalziel Ingredients Ltd. – Blending business, Rillatech – Packaging conversion and Dalziel Ltd. – Wholesale & Distribution.

The business is committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure modern slavery and human trafficking are not taking place in any of our own business units or organisations that have any sort of a business relationship with those business units directly or indirectly.

JRD on Modern Slavery and Human Trafficking

JRD has a zero-tolerance policy to Modern slavery and human trafficking. We expect all those direct and indirect organisations that deal with our business units to comply with the values of this statement and our Ethical Code of conduct.

Due Diligence for Slavery and Human Trafficking in Supply Chain

JRD adopts different information sources including Horizon Scanning, SEDEX etc. to identify high risk countries of origin or regions 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 within our own business we have a fully implemented whistleblower process which is monitored, and all incidents raised are fully investigated independently.

Our Temporary labour agencies are always with a UK provider, and we expect these entities where appropriate to be licenced with Gangmasters and Labour Abuse Authority and to provide sites with evidence of this plus Modern slavery and human trafficking statements, policies and processes to prevent Modern Slavery & Trafficking.

Current Identified Risks of Modern Slavery and Trafficking in JRD

Using Horizon Scanning and other Industry sources the Group Compliance & Sustainability Manager will continue to monitor any products that have been identified as potential risk of Modern Slavery and Human Trafficking and have put in appropriate mitigations to eliminate Modern Slavery and Human Trafficking including all direct and indirect dealing with our business units.

Countries of concern are identified as Cuba, Iran, Syria, the Crimean Region of Ukraine, North Korea and potentially other specific regions identified within a particular country such as Xinjiang region. Where JRD identifies such locations we will avoid, where possible, purchasing items from these countries or regions. Where we do have to purchase, we have put in the appropriate mitigations to eliminate Modern Slavery and Human Trafficking with our direct and indirect suppliers.

For the list of restricted countries or regions in the Ethical Code of conduct JRD will request directly what measures are in place to prevent Modern Slavery and Human Trafficking.

Monitoring of our Supply Chain for Modern Slavery and Human Trafficking

JRD has put together a Group level team covering Purchasing, HR, Technical, Health & Safety and Operations to agree relevant indicators.

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:



- The Group Compliance & Sustainability manager will maintain an overview of the performance of each department in meeting our responsibilities under this policy, recommending to the business where such performances can be enhanced to ensure we meet our obligations.
- 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, JRD expectations and instigate our Ethical and Corporate Responsibility document for our Supply Chain.
- Technical Services will monitor and review the potential risk of Modern Slavery and Human Trafficking for direct and in direct suppliers using the current SAQ and the SEDEX system.
- Operations will ensure, with support from HR, that they undertake the appropriate checks with Agencies supplying temporary labour that they meet all the legal requirements and moral obligations on Modern Slavery and Human Trafficking.

Training on Modern Slavery & Trafficking within our Organisation

The Group Compliance & Sustainability manager will be responsible for developing the appropriate training for basic awareness and more in-depth training for specific departments such as Purchasing and Technical.

Human resources in conjunction with the business units will ensure employees receive an induction into the business where our modern 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.

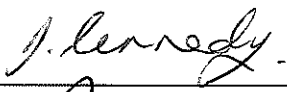
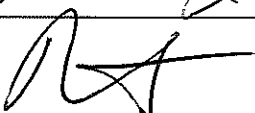


Reporting Suspicions of Modern Slavery and Human Trafficking

All employees, visitors or contractors can report any suspicions of slavery either through the documented JRD Whistleblower process or externally to the Modern Slavery Helpline, details are set out below:

<https://www.modernslaveryhelpline.org/>

0800 0121 700.

The Statement will be reviewed on an annual basis by the business

Signed By: Senior Site Manager		Date:
Signed By: HR Manager		Date: 04/07/23
Signed By: Group Technical Manager		Date: 03/07/2023
Signed By: Managing Director		Date: 20/6/23
Signed By: Chairman		Date: 20/6/23