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| QMS – Group Policy Manual                         |  |
| Modern Slavery & Human Trafficking Statement 2024 |  |
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| Author: S. Dalziel /I. Darroch                    | Authorised By:  |

## **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, tested and all incidents raised are fully investigated independently.

In 2023 we have had no incidents raised using the system and a test was carried out on the system.

Our Labour agencies will be always with a UK provider, and these entities need to be a registered business, licenced where legally required with the Gangmasters and Labour Abuse Authority or other memberships as appropriate and to provide sites with evidence of the certificates. As part of our new checklist, they should also provide Modern slavery and human trafficking statements, policies, and procedures to show how they 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 and regions of concern are identified as Cuba, Iran, Syria, Yemen, North Korea, Sudan, Chad, Ghana, Crimea, Donetsk, Luhansk, Kherson, Zaporizhzhia and Chernobyl regions of Ukraine, Palestinian controlled areas e.g. Gaza and West Bank and Xinjiang region of China. Where JRD identifies such locations within our supply chains we will avoid, where possible, purchasing items from these countries or regions. Where we do have to purchase, we will put in the appropriate mitigations to eliminate Modern Slavery and Human Trafficking with our direct and indirect suppliers.

For the list of countries or regions of concern 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, Compliance, Health & Safety and Operations to agree relevant indicators.

JRD currently uses the following key performance indicators as metrics 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 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, payroll audits and putting together list of agencies and update to date checklist.
- The Purchasing teams will undertake a level of communication and personal contact through training with the next link in the supply chain to ensure their understanding of, and compliance with, JRD expectations.
- Technical Services will monitor for direct and in direct suppliers using the SEDEX system to show how many have the processes in place to prevent Modern Slavery and Human Trafficking and to show using Radar the potential risk countries.
- Operations will ensure, with support from HR, that they undertake the appropriate checks using the checklist 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 and further training will be carried out in 2024.

Human resources in conjunction with the business units for employees are receiving a basic awareness of Modern Slavery & Trafficking through E learning alongside a documented brief on the Modern Slavery & Human Trafficking statement.

**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.

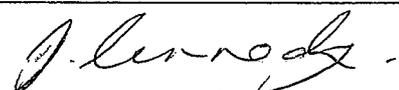
**Reporting Suspicions of Modern Slavery and Human Trafficking**

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 or telephone number, details are set out below:

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

0800 0121 700.

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

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| Signed By:<br>Senior Site Manager                             |   | Date:               |
| Signed By:<br>HR Manager                                      |  | Date:<br>13/08/2024 |
| Signed By:<br>Group Compliance &<br>Sustainability<br>Manager |  | Date:<br>06/08/2024 |
| Signed By:<br>Managing Director                               |  | Date:<br>06/08/2024 |
| Signed By:<br>Chairman  |  | Date:<br>06/08/2024 |