

Modern Day Slavery & Human Trafficking Statement

1. Purpose

To ensure all employees that work for and on behalf of Radnor Hills act in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our company human traffic and slavery policy.

2. Scope

This procedure applies to all Radnor Hills employees.

3. Procedure

It is the responsibility of the Managing Director to make sure appropriate measures are in place to ensure all employees at the Radnor Hills site are treated fairly and in accordance with the Ethical Trading Initiative.

Radnor Hills respects human rights and do not tolerate any form of modern slavery. We recognised that we have a responsibility to take a robust approach to slavery and human trafficking.

This statement sets out actions taken by the company to enable us to understand all potential modern slavery risks related to its business and to put in place steps that aim to ensure that there is no slavery or human trafficking in our own business and its supply chains. The policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This statement relates to actions and activities during the financial year 1st June 2024 to 31st May 2025.

4. Our Business

We are a privately owned Water & Soft Drink Manufacture based in Wales which started in 1989. We produce a wide range of products ranging from water to premium adult pressés for the Food & Drink Sector.

We have approximately 250 employees in manufacturing, management, and clerical. We also engage a small number of agency workers to support the business at peak times throughout the year. These are generally employed in our manufacturing and packing departments.

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5. Our Supply Chain

We source and buy ingredients and packaging from approved suppliers who source globally. We then produce the products to sell direct to wholesalers and retailers. The company will not knowingly support or deal with any business involved in slavery or human trafficking.

6. Our Policies & Processes

Our commitment to human rights and modern slavery are captured in a number of policies and protocols throughout the company, including but not limited to the following:

- **Whistleblowing Policy:** Radnor Hills encourages all of its workers and other business partners to report any concerns related to the direct activities, or the supply chain of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee Code of Conduct:** During our employee induction process employees are taken through our expected behaviours and responsibilities. We strive to maintain the highest standards of employees with conduct and ethical behaviour.
- **Purchasing & Supplier Procedure:** Radnor Hills is committed to ensuring that its suppliers adhere to the highest standard of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of Radnor Hills Supplier Code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency Workers Policy:** Radnor Hills uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

7. Due Diligence

Radnor Hills acknowledges that the largest two risk areas in connection with potential modern Slavery is our supply chain for ingredients which are sourced worldwide and supply of temporary employees to site through Agencies. As a result, Radnor Hills will be:

- Training all employees in Modern Day Slavery throughout the Company with further training for the HR and Procurement Departments. This is an ongoing measure to ensure that current regulations are met.
- Developing a system for supply chain evaluation and verification.
- Reviewing all existing supply chains.
- Radnor Hills will implement a KPI system to ensure effectiveness which will include:

- Payroll Monitoring.

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- Completion of Audits by Managers.
- Communication and contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

Radnor Hills is committed to operating our business in compliance with all relevant laws and with the highest standards of ethics, honesty, and integrity. This statement is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement.



Simon Knight
Managing Director
Radnor Hills Mineral Water Company Limited
Date: 1st June 2024

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