RINGTONS

A FAMILY BUSINESS SINCE 1907

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 2024 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 policies on respecting human rights, including our Modern Slavery Policy, reflects our intention to act ethically and with integrity in all 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 systems to encourage the reporting of concerns by the Company's employees, including establishing a whistleblowing procedure for employees to report any concerns.

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Our Business and Supply Chains: Due Diligence, Identifying and Mitigating Risks

As laid out by the United Nations (UN)[1]:

- Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status.
- Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more.
- Everyone is entitled to these rights, without discrimination.

The UN state that businesses can impact all human rights – both positively and negatively. Through our human rights due diligence processes, we have identified the human rights our business could impact. As defined in Article 8 of the International Bill of Human Rights[2], the right to not be subjected to slavery, servitude or forced labour has been identified as a human right that could be caused by, contributed to or linked to our business. Therefore, it is important that we actively work to prevent modern slavery in our operations and our supply chains. Within Ringtons Sustainability Strategy, we commit to respect human rights in our operations and our supply chains.

Our employees & agency labour

We have policies embedded within our business and staff training. 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

Within our Sustainability Strategy we are completing actions that seek to mature our human rights due diligence approach. All suppliers are expected to read and acknowledge Ringtons' policies on respecting human rights and sign up to Ringtons Supplier Code of Conduct which includes a supplier commitment to comply with the ETI Base Code. We utilise our Sedex[3] AB Membership to link with our suppliers (where possible) and utilise the Sedex Radar Tool to assist risk profiling. We are developing our human rights (and environmental) risk assessment process. Through risk assessing our supply base we can identify areas where modern slavery (and other human rights violations) are at risk of occurring. This allows us to identify risks in our supply chains. We engage internally and

externally (for example with suppliers, certification bodies and NGOs) to prevent and mitigate risk.

Our Targets

In the financial year 2024-2025 we will continue to develop our human rights due diligence approach. We continue to build and review our risk assessment. The Company will identify salient risks and explore actions to mitigate risks, working strategically with 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 and we will review where more training can be offered.



Nadia Johnson
Director
Ringtons Limited
June 2024

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[1] United Nations Human Rights. [Online] Available at: https://www.un.org/en/global-issues/human-rights
[2] International Bill of Human Rights. [Online] Available at: https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights
[3] Sedex. [Online] Available at: https://www.sedex.com/