

CLF Distribution Ltd

Modern Slavery and Human Trafficking Statement January 2024 – December 2024

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities of CLF Distribution Ltd. The statement sets out our commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

CLF is one of the UK's leading wholesalers in the specialist health food sector, stocking around 16,000 products with an annual turnover of £58million. The Company operates one site in Southampton, UK but imports/exports goods within Europe and the rest of world.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set out our approach to identify modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing Policy** The Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- **CLF Code of Conduct** The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.

Due Diligence Processes for Slavery and Human Trafficking

CLF undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners as well as evaluating the modern slavery and human trafficking risks of each new supplier. Any suppliers which do not meet the criteria will have sanctions invoked against them including the termination of the business relationship if required.

CLF Distribution is committed to compliance with our ethical trading code which consists of the following criteria:

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining is respected.
- Working conditions are safe and hygienic.
- Child labour shall not be used.
- Fair wages are paid and working hours are not excessive.
- No discrimination is practised.
- Regular employment is provided where possible.
- No harsh or inhuman treatment is allowed.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- We discover no contra-indications in our due diligence checks around new and existing suppliers.

- None of our suppliers are featured in campaigns or articles from pressure groups and publications such as The Food Empowerment Project, Ethical Consumer, etc. We will actively monitor these publications and groups.

Our Suppliers

CLF operates a supplier policy and maintains an approved brand supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. This due diligence includes an online search to ensure that an organisation has never been convicted of offences relating to modern slavery, and onsite audits where feasible. Our anti-slavery policy forms part of our agreement with brand suppliers and they are required to confirm that no part of their business operations contradicts this policy before we approve them. This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Logan Holiday
Managing Director
1st January 2024