

## Modern slavery and human trafficking statement 2023

<b>DATE OF REVIEW</b>	April 2024
<b>DATE OF NEXT REVIEW</b>	February 2025

### Introduction

This statement sets out Radstock Co-operative Society's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 26th February 2023 to 24th February 2024.

As part of the retail and farming sectors, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

### Organisational structure and supply chains

This statement covers the activities of Radstock Co-operative Society:

- The Society operates in convenience food retail, property rental and farming.
- The retail estate comprises of a number of convenience stores with the majority of its grocery range supplied by The Co-operative Group Limited, a separate independent co-operative based in Manchester, via a joint buying arrangement managed by Federal Retail and Trading Services. Our supply chain of locally produced products and goods operate within our trading areas.
- The Society supports a number of local suppliers of product and services from cleaning services, maintenance and shop fitting contractors, stationary, and security suppliers etc, the majority of which are UK based.
- The farming operation consists of a 1000-acre dairy farm supplying milk under a national co-operative contract.
- The property portfolio consists of a number of commercial and residential properties which the Society rents or leases to business or private tenants.

### Countries of operation and supply

- We currently operate within the United Kingdom with the majority of our activities in the Somerset and Wiltshire areas of the South West of England.

The following is the process by which the Society assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- We have analysed our supply chains, and although no business or country is immune from the risk of modern slavery, the vast majority of our suppliers are based in the UK.
- The Society's main supplier to the food retail business is the Co-operative Group Limited which has a robust and rigorous anti-slavery policy consistent with its ethical trafficking stance as set out in its annual sustainability report.



Democracy



Self help



Equity



Social responsibility



Equality



Honesty



Openness



Self-responsibility



Solidarity



Caring for others

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### High-risk areas

The following activities are considered to be at high risk of slavery or human trafficking:

- The use of casual labour at the farm as workers are not contracted or employed directly by the Society. Due to the seasonal nature of the farm's operation and a requirement for night working during some months, casual labour is considered the most cost effective and efficient method of meeting the staffing requirements. All labour is supplied by employment agencies who may utilise Eastern European workers to meet demand.
- To reduce the risk the farm management agency, has a dedicated recruitment provision to ensure the correct process of casual workers is in place.
- To reduce the risk further the Society, where necessary audits the recruitment processes of the employment agencies through the farm management agency and is satisfied that they have a robust recruitment policy which includes eligibility to work in the UK checks to safeguard against human trafficking of individuals being forced to work against their will.

### Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- Policies: The HR Manager is responsible for putting in place and reviewing policies and conducts comprehensive research and refers the best practise in the development of policies. It is the CEO and Board of Directors who are responsible for signing off all Society policies relating to people.
- Investigations/due diligence: The Senior Management team and HR department will determine and initiate investigations and due diligence in relation to known or suspected instances of slavery and human trafficking and will recommend suspension or removal from the Society's supply of products and services for approval by the Chief Executive Officer.
- Training: The Head of Retail Operations ensures there is due diligence conducted by all relevant individuals who are involved with the sourcing of new or existing local suppliers or those outside of the Co-operative group Limited supply chain. The HR department conducts training with managers responsible for recruitment to ensure this complies with the Modern Slavery Act 2015 with regards to the employment of colleagues across the Society.

### Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

#### Whistleblowing policy

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our Society. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.



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Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees who have concerns can raise these through our confidential internal email address to the HR department. Members can raise concerns by addressing correspondence to the Society Secretary. Customers and others can raise concerns via the external enquiries portal addressed to: [enquiries@radstock.coop](mailto:enquiries@radstock.coop)

### Dignity at Work Policy

Our policy makes clear to colleagues the actions and behaviour expected of them when representing our Society. We strive to maintain the highest standards of colleague conduct and ethical behaviour when operating in this country and managing our supply chain.

### Supplier/Procurement code of conduct.

We are committed to ensuring that our suppliers adhere to the highest standards 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. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Any serious violations of our supplier code of conduct will lead to the termination of the business relationship.

### Recruitment policy & Recruitment Agency

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from that agency. The recruitment policy and procedure includes eligibility to work in the UK checks and balances with clear statements on the necessary documentation and processes to be followed by recruiting managers to safeguard against human trafficking.

### Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- Creating an annual risk profile for each supplier;
- Using sanctions against suppliers who fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking, such as participation in “Stronger together” or “Ethical trading initiatives”.



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## Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- Requiring supply chain managers / HR professionals to have completed training on modern slavery by 30th June 2024;
- Reviewing the need for a system for supply chain verification, date to be confirmed, whereby we evaluate potential local suppliers before they enter the supply chain; and
- Reviewing our existing supply chains, whereby we evaluate all existing suppliers.

## Training

We require all supply chain managers/ retail managers / HR professionals within our Society to complete training on modern slavery as a module within our wider ethics training programme.

Our modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below national minimum wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps our Society should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

## Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by distributing flyers to colleagues/putting up posters across our premises.

The flyers/posters explain to colleagues:

- The basic principles of the Modern Slavery Act 2015;
- How colleagues can identify and prevent slavery and human trafficking;



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- What colleagues can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

### CEO approval

This statement was approved on 11th April 2024 by our Chief Executive Officer on behalf of the business, who will review and update it annually.

Signature:   
**Don Morris, Chief Executive Officer**

Date: 11th April 2024

