

Modern Slavery and Human Trafficking Statement

Date of Creation: February 2018

Date of Review: November 2021

Date of Next Review: February 2022

Status: Implemented

Owner: Human Resources

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 24 February 2020 to 27 February 2021.

As part of retail and farming sectors, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. The Society is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Radstock Co-operative Society and applies to all individuals working for the Society or on the Society's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants, and business partners.

The Society operates in the retail, property rental and farming sectors with its businesses further categorised as follows:

- 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. The Society supports a number of local suppliers of product and services from cleaning services, maintenance and shop fitting contractors, stationery, and security suppliers etc, the majority of which are UK based. Our supply chain of locally produced products and goods operate within our trading areas.
- The farming operation consists of a 1,000-acre dairy farm supplying milk under a national co-op contract.
- The property portfolio consists of a number of commercial and residential properties which the Society rents or leases to business or private clients.

Countries of operation and supply

The Society currently operates within the United Kingdom only with the majority of its activities operating in Somerset and Wiltshire areas.

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 trading stance as set out in its annual Sustainability report.

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 Society, where necessary, audits the recruitment processes of the employment agencies it utilises and is satisfied that they have a robust recruitment policy which includes eligibility to work in the UK checks to safeguard against human trafficking or individuals being forced to work against their will.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** HR manager is responsible for putting in place and reviewing policies and will conduct comprehensive research and refer to best practise in the development of policies. It is the board of Directors who are responsible for signing off all Society policies relating to people.
- **Investigations/due diligence:** The Head of Retail Operations and the HR Manager 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 HR Department conducts training with all relevant individuals in the aspects of the Modern Slavery Act 2015 with regards to the employment of colleagues across the Society. The Head of Retail Operations ensures that 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.

Relevant policies

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

- **Whistleblowing policy** The Society encourages all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can raise concerns in confidence to the Society's Secretary or the HR Manager.
- **Dignity at Work policy** Our policy makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Equal Opportunity policy**
- **Supplier/Procurement code of conduct** The Society is committed to ensuring that its 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. The Society plans to work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Society's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** The Society has a robust recruitment policy and procedure which includes eligibility to work in the UK checks and explores other personal circumstances in an endeavour to safeguard against human trafficking. The Society, when appropriate, 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.

Due diligence

The Society undertakes due diligence when considering taking on new suppliers, and regularly reviews its 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.
- conducting supplier audits or assessments through [the Society's own staff/third party auditor], which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- creating an annual risk profile for each supplier
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through [third party auditor] and requiring them to implement action plans [provide examples].
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular [provide examples such as participation in "Stronger together" or "Ethical trading" initiatives].
- using [details of ethical supplier database], where suppliers can be checked, for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that 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.

Performance indicators

The Society has 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 November 2021
- developing a system for supply chain verification expected to be in place by November 2022, whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewing our existing supply chains expected to be completed by November 2022, whereby we evaluate all existing suppliers.

Training

The Society requires supply chain managers/HR professionals within the Society to complete training on modern slavery.

The Society's modern slavery training will cover:

- 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 a country's 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 staff/putting up posters across the Society premises/circulating a series of emails to staff.

The flyers/posters/emails explain to staff:

- the basic principles of the Modern Slavery Act 2015
- how employers can identify and prevent slavery and human trafficking
- what employees 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.

Board approval

This statement is approved on the 26th November 2021 by the Society board of directors, who review and update it annually.

President's signature:



Date:

26th November 2021