Modern Slavery Act Policy

INTRODUCTION FROM THE BOARD OF DIRECTORS
We are committed to improving our practices to combat slavery and human trafficking. We take our obligations under the Modern Slavery Act 2015 very seriously and have a robust working practice to comply with our obligations. This policy sets out those practices and gives insight into the supply chain and business processes of the company. This statement relates to the actions and activities during the financial year 1st April 2016 to the 31st March 2017.

ORGANISATION STRUCTURE AND SUPPLY CHAINS
Established more than 30 years ago, we remain an independently-owned business that supports 130 staff in and around the Bedford area. With truly global reach, we trade across three continents, which has enabled us to become the second largest oat miller in Europe. Across our two main sites we are able to process more than 120,000 tons of grain each year. Our current expansion plans will see this output grow significantly to ensure our business continues to diversify and flourish.

We are members of the Ethical Training Initiative (ETI) and we are regularly audited by third parties who publish our results on the Supplier Ethical Data Exchange (Sedex). This is a web-based database where suppliers post labour standards information and self-assessments in addition to all site audit reports.

We internally review our supply chain to evaluate human trafficking risks and slavery risks and we conduct supplier self-assessments and audits which review all aspects of the supply chain including safety, human trafficking, child labour and other legal requirements.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING
We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking does not take place anywhere within our supply chain.

Any concerns from any member of our staff regarding a likely risk of, or actual, breach of our policy or the legislation must be raised to the board of directors at the earliest opportunity.

RELEVANT POLICIES
In keeping with our commitment to act with integrity in all our business dealings, many of our existing
policies ensure that there is no slavery or human trafficking in any part of our business or supply chains.

Our relevant policies include:

– Code of Conduct;

– Employment Policy;

– Health Protection and Wellbeing Policy;

– Public Interest Disclosure Policy

In our Code of Conduct, relevant sections cover; discrimination and harassment, human rights, responsible procurement and supplier partnerships and anti-illicit trade.

Our Code of Conduct sets out the behaviours we expect from employees in their dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisers, governments and competitors. All employees and suppliers are expected to act with integrity in accordance with the standards of behaviour set out in the Code of Conduct.

We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions and the Code of Conduct. We encourage employees to raise concerns and we have a Public Interest Disclosure Policy.

We believe in business benefits brought about by diversity and equal opportunity. We therefore support collective bargaining for our own employees and through our supplier standards.

We actively support employee engagement, representation, dialogue and the ability of an employee to raise potential concerns or grievances. Freedom of association and the right to collective bargaining is a core labour standard that we respect as guided by the International Labour Organisation (ILO). We apply our employment practices in line with, and in certain aspects exceeding the requirements of, local legislation.

We recognise that we operate in a number of countries where human rights are an issue of particular concern. Following periods of new acquisition and before our employment practices and monitoring are embedded, we use trained social auditors as a basis for evaluation of performance improvement based on risk assessment.

We are guided by the SA8000 standard to cover a variety of potential issues including child labour, forced labour, health and safety, freedom of association, the right to collective bargaining, discrimination, disciplinary practices, working hours, remuneration, and management systems.

**RISK ASSESSMENT AND DUE DILIGENCE**

The risk of slavery and human trafficking within our own organisation is substantially avoided and mitigated as a result of strict policies and procedures as well as the oversight built into our business operations, and the knowledge and skills of our staff. We assess risk based on a number of factors such as geographical risk indices pertaining to human rights, the level of supply chain control, external governance factors and levels of political stability.

We consider that the greatest risk of slavery and human trafficking is in our supply chain where we
undertake procurement activities and where operations and managerial oversight are out of our direct control. In addition to the training and awareness provided by our Code of Conduct, we also have supplier standards and specific supplier programmes.

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

– Mapping the supply chain broadly to assess particular products or geographical risks of modern slavery and human trafficking.

– Evaluating the modern slavery and human trafficking risks of each new supplier. This is achieved through supplier self-assessment processes and auditing.

– Conducting supplier audits using accredited third party supplier auditors.

– Invoking sanctions against suppliers that fail to improve their performance in-line with an action plan. Serious violations of our supplier code of conduct, lead to the termination of our business relationship.

TRAINING AND AWARENESS
We ensure that we have competency within our organisation, through training relating to human rights and the awareness of the social accountability standard SA8000. We use accredited third party supplier auditors who are trained social compliance auditors to work and advise our management team and employees.

Human rights awareness training has been further directed to personnel who work in human resources and corporate affairs. Specific supplier standards training is directed at procurement personnel. More general awareness is available throughout the wider organisation through our Code of Conduct.

We further provide guidance and training to support employees understanding of expected behavior, particularly in respect of their business decisions and the Code of Conduct.

BOARD OF DIRECTORS APPROVAL
This statement has been approved by our Managing Director and Company Secretary who will review and update it annually and assure our Board compliance is followed.
Ingredients
Oat-Based
Wheat-Based
Barley-Based
Flakes
Protein Crispies
Extruded Cereal Ingredients
Animal Feed and Biomass
New Product Development

News Articles
AA BRC for Richardson (UK) Ltd.'s Mill
Richardson International Acquires European Oat Millers
EOM Track 200 2013

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