



INTRODUCTION FROM THE BUYING DIRECTOR

We are committed to improving our practices to combat slavery and human trafficking.

We have already introduced an Anti-Slavery and Human Trafficking Policy which will be briefed out to all staff and training will be provided to those who have direct supply chain responsibilities.

We will also conduct a review of our procurement policies and other existing policies and procedures relevant to modern slavery.

We will ensure that our Company code of conduct addresses how employees and other associated persons (agents, suppliers and other service providers) are required to act to minimise the risk of slavery and human trafficking occurring in the business and in its supply chains.

We will undertake a review of existing supplier arrangements, particularly in high risk sectors or jurisdictions, and, where necessary, seek to amend agreements to ensure that suppliers are obliged to comply with the requirements of the Act and the Company's code of conduct.

We will update our standard agreements to ensure suppliers and, in turn, their suppliers, will comply with the Act and the Company's code of conduct.

I have been appointed as compliance officer at board level and have overall responsibility for overseeing implementation of policies and procedures and annual preparation of the slavery and human trafficking statement.

Our Company's whistleblowing policies already adequately accommodate the reporting of modern slavery issues in the business and supply chain.

ORGANISATION'S STRUCTURE

We are a provider of wholesale goods in the retail sector. Rayburn Trading Company Ltd has its head office in the UK. We have 170 employees and supply goods to over 60 countries.

OUR BUSINESS

Our business is organised over 2 sites; one in Cheetham Hill, Manchester and one in Bury, Greater Manchester.

The Cheetham Hill site comprises of a 5000-pallet space warehouse where the majority of our staff are employed. It also houses our head offices administrative functions.

Our Warehouse comprises of the following departments:

- Order Picking – customer orders are picked and built on to pallets by order pickers and then wrapped and stored for either collection or delivery. This area is split in to UK Picking and Export Picking.



- Goods In – where we receive and process supplied goods on to our warehouse management system and move them through to be located in our warehouse or transferred to our second site.
- Transport/Goods Out – Our own vehicles are loaded, routed and tracked from here and 3rd party vehicles are also loaded from here too.

Our Administrative Offices comprise of the following departments:

- Finance – this covers accounts, credit control and payroll
- IT- covers maintenance and supply of all IT equipment and responsible for the security of our systems
- HR – Responsible for the management and implementation our people policies and strategies, recruitment, training and development.
- Sales – This includes internal and external sales representatives, National Account Managers and a team dedicated to Export sales
- Buying – Responsible for the procurement of all goods.
- Stock Control – Responsible for the management of stock within both locations.

Our site in Bury, is primarily an operational site which affords us a further 5000 pallet spaces. It is used as an overflow warehouse to store bulk stock and also has a bulk and export picking function. Some goods are received directly in to this site from suppliers, others are shunted from the Cheetham Hill Site for storage.

OUR SUPPLY CHAINS

Our supply chains include purchasing stock from UK manufacturers, e.g. Unilever, Proctor and Gamble, as well as importing our own range of products from the Far East, selling stock mainly in to independent and discount stores UK and worldwide.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we will be conducting a review of our procurement policies and other existing policies and procedures and undertake a review of existing supplier arrangements, putting processes in place to vet new suppliers.

We have in place systems to:



- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we will be putting in place a supply chain compliance programme.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We will develop key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending August 2017.

Signed:

Russel Goldman

Buying Director Rayburn Trading Company Ltd

July 2018