



## MODERN SLAVERY STATEMENT

### 1. Introduction

This statement sets out Rayburn Trading Company Ltd.'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 1<sup>st</sup> September 2021 – 31<sup>st</sup> August 2022.

As a provider of retail goods in the wholesale sector, Rayburn Trading Company Ltd recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Rayburn Trading Company Ltd 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.

### 2. Organisational Structure and Supply Chains

We are a provider of wholesale goods in the retail sector. Rayburn Trading Company Ltd has its head office in the UK. We have 165 employees and supply goods to over 60 countries.

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 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.

As part of our initiative to identify and mitigate risk we have reviewed our procurement procedures and other existing policies and procedures and have a process in place to review existing supplier arrangements and 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.

### **3. Relevant policies**

Rayburn Trading Company Ltd operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human



- **Whistleblowing policy** Rayburn Trading Company Ltd encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Rayburn Trading Company Ltd.'s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** Rayburn Trading Company Ltd.'s code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** Rayburn Trading Company Ltd 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. Rayburn Trading Company Ltd works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship. [Describe the process and steps taken to implement the code of conduct in relation to slavery and human trafficking, including examples (not necessarily named) where action has been taken to address specific slavery and human trafficking risks.]
- **Recruitment/Agency workers** Rayburn Trading Company Ltd 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.

#### 4. Due diligence

Rayburn Trading Company Ltd undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Rayburn Trading Company Ltd.'s 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;



- 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.

## 5. Training

Rayburn Trading Company Ltd requires staff working with our supply chain to complete training on modern slavery.

Rayburn Trading Company Ltd.'s 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 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 the 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 the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.



**Board Approval**

This statement has been approved by Rayburn Trading Company Ltd.'s board of directors, who will review and update it annually.

A handwritten signature in black ink, appearing to be 'R. Goldman', written over a horizontal line.

**Signed:**  
**Russell Goldman**  
**Buying Director Rayburn Trading Company Ltd**  
**August 2021**