

EDEN SPRINGS UK LIMITED MODERN SLAVERY & ETHICAL TRADING STATEMENT

Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights. Eden Springs UK Limited recognises that as a commercial organisation it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms.

The organisation is committed to preventing modern slavery and human trafficking in its corporate activities, and to ensuring as far as we are able that our supply chains are free from slavery and human trafficking, and that we trade ethically with our supply chain partners.

RELEVANT POLICIES

The organisation 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 trafficking in its operations:

WHISTLEBLOWING POLICY

The organisation 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. The organisation's 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 use our independent confidential helpline www.ethicspoint.com and complete our confidential disclosure form.

EMPLOYEE CODE OF CONDUCT

The organisation'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 managing its supply chain.

SUPPLIER/PROCUREMENT CODE OF CONDUCT

The organisation 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. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. We seek to develop long-term relationships with our suppliers based on the principles of fair, open and honest dealings at all times. Only suppliers that share these principles and can demonstrate compliance to ethical standards will be considered appropriate to trade with Eden Springs UK Ltd.

RECRUITMENT/AGENCY WORKERS POLICY

The organisation 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. Eden Springs UK carries out twice yearly audit questionnaires on every agency worker and also randomly selects individual workers for interview.

DUE DILIGENCE

The organisation undertakes due diligence when considering taking on new suppliers, and are in the process of reviewing our existing suppliers. This due diligence includes:

- 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 Ethical Audit's and Agency Audits to ensure a greater degree of focus on slavery and human trafficking where general risks are identified.
- Creating an annual risk profile for each supplier.
- 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.

RISK ASSESSMENTS

We assess all our suppliers through robust risk-based systems and then monitor them accordingly. Our assessment tools determine the level of risk posed by each supplier, with the highest risk suppliers being required to regularly demonstrate compliance via a third party independent ethical audit and to ensure any non-compliances are addressed within the timescales appropriate to the criticality.

Risk Assessment Audits are conducted on a basis and frequency dependent upon the level of risk each supplier is scored against.

- High risk suppliers – audited annually (or greater dependent upon risk score factor)
- Medium risk suppliers – audited or audit questionnaire every two years
- Low risk suppliers – audit questionnaire every three years

SUPPORT AND DEVELOPMENT

We are committed to providing guidance and support, where and when appropriate, for our colleagues and suppliers to identify and resolve modern slavery, human trafficking and ethical issues. We encourage and support continuous improvement in supplier standards and we regularly measure supplier improvement.

TRAINING AND AWARENESS

The organisation requires all senior managers, key staff working in supply chain management and relevant roles to complete training on how to assess the risk of slavery and human trafficking in relation to various aspects of the business, how employees can identify the signs of slavery and human trafficking and what should be done if this activity is suspected.

As well as training staff, the organisation is raising awareness of modern slavery issues by distributing flyers to staff, putting up posters across the organisations premises and circulating a series of emails to staff. These 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 the organisation.
- What external help is available, for example through the Modern Slavery Helpline.

SENIOR MANAGEMENT TEAM APPROVAL

This statement has been approved by the Senior Management Team of Eden Springs UK Limited who will review and update it annually.