

Ragus®



Pure Sugars

SOURCING : MANUFACTURING : CONSULTING : DELIVERING

Our Business in Global Society

**Modern Slavery
Statement and Policy**

2023

Our Business in Global Society

Ragus®



Ragus is a responsible business. Our commitment to corporate social responsibility (CSR) underpins our brand and is embedded in everything we do. It qualifies us to supply the most demanding customers in the industries we serve.

As the UK's leading independent importer and manufacturer of pure sugar products for industry, CSR runs through our health and safety; quality and talent management strategy, and employee behaviour; sustainability; supply chain management and customer service; risk management strategy, with zero tolerance of bribery and corruption and respect for human rights.



Ragus Sugars
Manufacturing Ltd.
830 Yeovil Road
Berkshire SL1 4JG
England



Modern slavery statement



Human rights



Labour practices



Fair operating
practices



Organisational
governance

Company

This statement applies to Ragus Sugars Manufacturing Ltd (referred to in this statement as ‘the Company’). The information included in the statement refers to the financial year 2021-2022.

Organisational structure

The Company operates from one site (830 Yeovil Rd, Berkshire, SL1 4JG, England) from which location all employees work.

Day to day manufacturing operations are conducted by team leaders and managers who report to their respective department manager/s. These operations, alongside Sales, Purchasing and Marketing, are ultimately controlled and managed by the Board of Directors.

The Company’s main activities are manufacturing, selling and distributing a diversified portfolio of high-quality sugar products with a corporate philosophy of adhering to the highest ethical conduct in business dealings, treatment of its employees and social and environmental policies. The Company performs the sale of its sugar products direct to industry. Demand for the Company’s product is consistently high throughout the year and is therefore not seasonal.

The core operations of the Company, which are manufacturing a diversified portfolio of high-quality sugar products, and the Company’s workforce engaged to deliver this are located solely in the United Kingdom.

Definitions

Consistent with the relevant legislation currently in force (Modern Slavery Act 2015), the Company considers that modern slavery encompasses:

- *Human trafficking*
- *Forced work, through mental or physical threat*
- *Being owned or controlled by an employer through mental or physical abuse or the threat of abuse*
- *Being dehumanised, treated as a commodity or being bought or sold as property*
- *Being physically constrained or to have restrictions placed on freedom of movement.*

Commitment

The Company has a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws.

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.

The Company does not enter into business with any other Company, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Supply chains

The Company requests from all its suppliers, details around their compliance with the Modern Slavery Act 2015 and reviews these responses. Suppliers that are not covered by the legalisation or don't have statements are requested to read our policy and confirm that they adhere to the principles of the Modern Slavery Act, while being advised that further details can be found at www.modernslaveryhelpline.org

In order to fulfil its activities, the main supply chains of the Company include those related to sugar and sugar derived raw materials. Sugars derived from both beet and cane are sourced globally. The Company has a responsibility to ensure this global supply chain is ethical and environmentally sustainable.

The Company recognises that it is exposed to greater risk when dealing with its suppliers, particularly those who have operations/supply chains outside of the UK. The following measures to review and manage this risk are in place:

- *A commitment to collaborate closely with suppliers to help them understand and work towards their own obligations under the Modern Slavery Act.*
- *A Responsible Purchasing Policy, which reflects the Company's commitment to and focus on suppliers' ethical supply chain(s).*
- *A Supplier Code of Conduct, which is used for all new major suppliers of goods or in re-tendering, clearly stating the firm's intention to step away (without penalty) if any occurrences of modern slavery are discovered.*

Potential exposure

The Company considers its main exposure to the risk of slavery and human trafficking to exist in its raw sugar supply chains, as they involve the provision of labour in locations where protection against human rights breaches may be limited.

In general, the Company considers its exposure to slavery/human trafficking to be limited. It has adopted the policies and processes below to ensure that such practices do not take place in its business nor the business of its suppliers.

Policies and processes to mitigate exposure

The Company reserves the right to complete due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its Company or supply chains, including conducting a review of the controls of its suppliers.

The Company has not, to its knowledge, conducted any business with another company that has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to reduce the risk of modern slavery occurring in its supply chain:

- *Reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.*
- *As a minimum mandatory requirement, all parties involved in the Company's goods and services supply chain are to abide by the Recommendations and Conventions of the International Labour Organisation (ILO) as well as the labour laws of the territory they operate in.*
- *Conduct a human rights risk assessment where deemed necessary which encompasses a broader conception of a human rights due diligence process.*
- *We recognise the importance of grievance processes and providing remedy where there is concrete evidence of adverse impacts on workers within supply chains.*
- *A zero-tolerance policy towards modern slavery.*
- *Use of online platforms such as SEDEX to monitor and share ethical and social performance of suppliers.*

Key performance indicators

The Company has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Company or its supply chains.

- *Effective use of the Company's Recruitment and Selection Policy;*
- *Use of labour monitoring and payroll system;*
- *Completion of audits of the Company and suppliers conducted by internal and external auditors; and use of SEDEX as a monitoring platform for the supply chain.*



Policies

The Company has several other policies which further define its stance on corporate social responsibility. To view the full list of policies, please visit: www.ragus.co.uk/responsibility/

Modern Slavery Compliance Representative

The Company has a CSR Manager, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Company's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.



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