

## Statement on Modern Slavery

### Legal context

The Modern Slavery Act (MSA) gives enforcement the tools to fight modern slavery, ensure perpetrators receive suitably severe punishments for these appalling crimes, and enhance support and protection for victims. It received Royal Assent in the UK on 26 March 2015<sup>i</sup>.

Organic Herb Trading Ltd falls below the £36M turnover threshold required for compliance - but for the reasons outlined below - has chosen to proactively support this legislation and has had an MSA statement in place since 2018. You can read our previous statement here:

[https://www.organicherbtrading.com/downloads/statement-on-modern-slavery/statement-on-modern-slavery-jan-2021\\_3.pdf](https://www.organicherbtrading.com/downloads/statement-on-modern-slavery/statement-on-modern-slavery-jan-2021_3.pdf)

### The relevance of The MSA to Organic Herb Trading

50 million people live in modern slavery – in forced labour and forced marriage. A quarter of these are believed to be children. These human rights abuses take place in 167 countries<sup>ii</sup>.

Organic Herb Trading has been sourcing herbs, spices and botanicals from around the world for more than 40 years - always with a firm commitment to trade ethically and treat our suppliers with respect. The majority of these suppliers are in the Global South.

Whilst we may be a small player in the world of global trade, we take our responsibility to help prevent slavery – in all its forms – seriously. We welcome the requirements set out in the MSA, which place a responsibility on businesses to assess the risk of slavery occurring in their supply chains. This extends, but is not limited to:

- Forced labour
- Human trafficking
- Sexual exploitation
- Child labour
- Financial exploitation

In writing this statement the Board is not attempting to merely comply with the legislation, protect the company brand or push the responsibility down the supply chain, we are trying – in our own small way - to make a difference. **The practice of treating people as property is indefensible and must end.**

In doing this work we recognise that we are not perfect, we welcome feedback, and we commit to continuing to find meaningful ways to improve.

If you have any comments or feedback, please e-mail [jim@organicherbtrading.com](mailto:jim@organicherbtrading.com)<sup>iii</sup>

### **Risk assessment within the UK**

In considering how best to focus our efforts, we believe that we already have strong due diligence in place relating to in-house employment practices and use of agency labour. We are audited and certified to the Fair For Life standard by Ecocert IMOSwiss<sup>iv</sup> (who are independent and third-party accredited), which confirms that:

*Workers enjoy fair and safe working conditions, covering all key labour aspects from core ILO workers' rights to good employment conditions.*

The certifier makes audit scores publicly available and ours can be found here:

[www.fairforlife.org/pmws/indexDOM.php?client\\_id=fairforlife&page\\_id=certified&lang\\_iso639=en&company\\_id=534](http://www.fairforlife.org/pmws/indexDOM.php?client_id=fairforlife&page_id=certified&lang_iso639=en&company_id=534)

Among the other services supplied to us within the UK are laundry, machinery maintenance, banking, power, freight, couriers and post, telecoms and IT, comestibles, stationery. Some of these suppliers publish their own MSA statements, others are sole traders (where an MSA may not be appropriate) and a minority are less transparent. However, all these businesses are subject to UK labour law which – while not a guarantee of compliance – does imply a lower risk and should act as a safety net.

### **Risk assessment outside the UK**

Wherever possible, we buy directly from suppliers at source/producer groups. A direct relationship means we can better understand the factors which may lead to modern slavery and can help prevent it. These suppliers represent the vast majority of our purchases – over 75%. This is where we have chosen to target our efforts, primarily because it is where we feel there is the greatest risk - and where we can have a meaningful impact.

A much smaller proportion of our purchases comes from Europe-based wholesalers. We have much less influence over these supply chains, because they offer very little transparency.

The Global Slavery Index<sup>v</sup> gathers data on the estimated prevalence of modern slavery, country-by-country. This identifies agriculture as being a particular risk area for forced labour, because:

- By its nature the work is labour-intensive.
- In many countries agriculture is loosely regulated.
- The workers are often vulnerable to exploitation - which is exacerbated when there is a migrant workforce.

The report ranks countries by proportion of the population living in slavery, which enables us to crosscheck the highest-risk areas against the countries we source from.

This exercise directs our focus to 5 countries that we regularly buy from in significant volume: Turkey, Afghanistan, Albania, Bulgaria and India.

In addition, due to the inherent risks associated with the *Camellia sinensis* estate model, we also focus on China, Vietnam, Rwanda and Mozambique.

### **Actions to mitigate risk with suppliers in the Global South**

Buyers can play a key role in encouraging ethical practices in agricultural supply chains. Trading fairly is central to our approach, so many of our existing policies and procedures should mitigate the risk of slavery in our supply chains. These include:

- An Ethical Sourcing Policy that formally commits Organic Herb Trading to working in partnership and for the long-term with our suppliers.
- We do not – under any circumstances – drive the price down with suppliers at source. This means that we are playing our part to alleviate financial pressures – which is arguably the thin end of the wedge in terms of human exploitation.
- If we uncover practices that need to be improved, we will not walk away – our aim is to work with suppliers to resolve these.
- When suppliers are in crisis because of existential threats (flood, failed harvest, Covid-19 etc.) we support them, often financially. Either through core funding or advancing payments against future orders.
- Detailed supplier visits with associated compliance audits undertaken by Organic Herb Trading staff.
- In-country expertise from our representative in Egypt, supporting best-practice and ensuring effective communication.
- Approval of suppliers to independent and third-party accredited ethical schemes. These include Fair Trade, Fair for Life, Fair Wild and global Organic Standards<sup>vi</sup>.
- These schemes cover key products in our range, which we published on our website<sup>vii</sup>. In addition, we also learn from these and adopt best practices across the business where appropriate.

### **Progress to date**

Inevitably, the global pandemic and an inability to visit suppliers for over two years had a real impact on the targets set out in our original MSA statement. Nonetheless, the following has been completed since 2018:

- Staff who visit suppliers at source have been trained how to identify the signs of slavery and what to do if forced labour is uncovered. This training was run by the Ethical Trading Initiative<sup>viii</sup>.
- Supplier approval documentation has been updated to include a comprehensive section on Modern Slavery. This has been sent to all suppliers.
- An in-depth section on the risks of slavery has been added to our supplier audit template.

## Targets to be achieved by 2027

- Appoint an independent, ethical supply chain specialist – to help support and direct our work in this area.
- Put in place a whistle blowing protocol so that wrongdoing can be anonymously reported.
- Update and publish Organic Herb Trading's Ethical Sourcing Policy and seek to embed this fully into our purchasing decisions framework.
- Arrange additional training for staff who visit suppliers, to help ensure they could identify the signs of slavery and know what to do if forced labour is uncovered.
- Ensure our top 50 core suppliers complete our ethical assurance questionnaire - which is grounded in the ETI Base Code<sup>®</sup> - and update this on an ongoing basis.
- Write a comprehensive risk assessment - to evaluate our supply chains for the likelihood of Modern Slavery. To ensure this is robust, will work with a third party who has a track record of delivery in this area.
- Audit at least two suppliers a year that fall into the high-risk category. These audits will be undertaken by a third-party auditor to the ETI Base Code or equivalent standards.

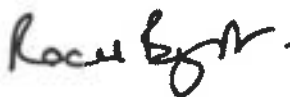
## Appropriate action

If we find incidences of slavery or poor human rights practices within supply chains, our priority will be to cause no further harm to the victims. Where possible, we would want to help resolve the underlying causes - liaising closely with the supplier. However, if no solution could be reached, we would cease our trading relationship with the supplier over an agreed timescale, which would almost certainly cover one harvest.

Signed on behalf of the Organic Herb Trading Board:



**Matt Richards**  
Global Supplier Manager



**Rachel Byrt**  
Head of Purchasing and Supply Chain



**Jim Twine**  
Managing Director

## References:

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- <sup>i</sup> [www.gov.uk/government/collections/modern-slavery-bill](http://www.gov.uk/government/collections/modern-slavery-bill)  
[www.legislation.gov.uk/ukpga/2015/30/contents/enacted](http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted)
- <sup>ii</sup> [www.ilo.org/resource/news/50-million-people-worldwide-modern-slavery-0#:~:text=Modern%20slavery%20occurs%20in%20almost,income%20or%20high%2Dincome%20countries.](http://www.ilo.org/resource/news/50-million-people-worldwide-modern-slavery-0#:~:text=Modern%20slavery%20occurs%20in%20almost,income%20or%20high%2Dincome%20countries.)  
[www.worldpopulationreview.com/country-rankings/countries-that-still-have-slavery](http://www.worldpopulationreview.com/country-rankings/countries-that-still-have-slavery)
- <sup>iii</sup> <https://www.organicherbtrading.com/about-us/the-team/>
- <sup>iv</sup> <https://directory.ifoam.bio/affiliates/150-ecocert-imoswiss-ag>
- <sup>v</sup> [www.walkfree.org/global-slavery-index/](http://www.walkfree.org/global-slavery-index/)
- <sup>vi</sup> <https://www.fairtrade.net/standard>  
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- <sup>vii</sup> <https://www.organicherbtrading.com/products-and-price-list/small-packs/>
- <sup>viii</sup> [www.ethicaltrade.org](http://www.ethicaltrade.org)
- <sup>ix</sup> <https://www.ethicaltrade.org/eti-base-code>