

Statement on Modern Slavery

Organic Herb Trading Ltd has been sourcing herbs, spices and botanicals from around the world for more than 35 years, always with a firm commitment to trade ethically and treat our suppliers with respect. We welcome the requirements set out in the Modern Slavery Act, which place a responsibility on businesses to assess the risk of slavery occurring in their supply chains. While the provisions of the Act apply only to businesses much larger than ours, we have chosen to respond proactively and voluntarily because we want to be part of the solution. We are institutionally opposed to forced labour. The practice of treating people as property is indefensible and must end.

Risk assessment

In considering how best to focus our efforts, we judge that we already have good due diligence in place relating to **in-house** employment practices and use of agency labour. We are audited and certified by Ecocert IMOSwiss (who are independent and third-party accredited) to the Fair For Life standard, which *'confirms that workers enjoy fair and safe working conditions, covering all key labour aspects from core ILO workers' rights to good employment conditions'*. Our scores from the most recent audit are publicly available [here](#).

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 statement, others we have chosen for their clear ethical policies, still others are less transparent. All are subject to UK labour law which – while not a guarantee of compliance – does imply a lower risk.

Looking to our supply chains from **overseas**, we make a distinction between buying from other traders (Europe-based wholesalers), and buying from suppliers at source (producer groups). Purchasing from traders offers us less transparency, and arguably these are supply chains over which we have less influence. Wherever possible, we buy directly from the company producing the plant ingredient. A direct relationship means we are able to better understand the factors which may lead to forced labour, and can help ensure it does not occur.

The Global Slavery Index¹ gathers data on the estimated prevalence of modern slavery, country by country. It 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: India, China, Egypt, Iran, and Turkey.

¹ The Global Slavery Index 2015, The Walk Free Foundation, (an initiative of The Minderoo Foundation Pty Ltd ATF The Minderoo Foundation Trust), www.globalslaveryindex.org

The report identifies agriculture as being a particular risk area for forced labour, because by nature it is labour-intensive, the workers are often vulnerable to exploitation, and in many countries agriculture is loosely-regulated. This combination of geographical and sector risks means our overseas raw materials purchasing is where our action should be concentrated to begin with.

Actions to mitigate risk

Buyers play a key role in encouraging ethical practices in agricultural supply chains. Trading fairly is central to our business, so much of our existing procedure already mitigates the risk of slavery in our supply chains:

- A formal Purchasing Policy for suppliers at source that prevents any downward price pressure
- An Ethical Sourcing Policy that formally commits Organic Herb Trading to working in partnership and for the long-term with our suppliers
- Detailed supplier visits with GACP audits undertaken by our Supplier Relationships Manager
- In-country expertise from our representative in Egypt, supporting best-practice and effective communication
- Working with third-party accredited ethical schemes – FairWild, Fairtrade and Fair for Life – which formalise the principles of fair trading and certify suppliers to rigorous standards. These cover certain products in our range (at least 20% of volumes purchased), and we also learn from them to adopt best practices across the whole business.

Targets

Clear opportunities exist to build on the strong base that is already in place at Organic Herb Trading. Over the course of the financial year 2018-19, we will:

- Carry out a review of the UK-based providers we work with, to establish how best we can engage with them on the risk of modern slavery in their businesses and supply chains
- Revisit our Purchasing Policy with specific risks of modern slavery in mind
- Engage with suppliers in the highest-risk countries to understand their local situation. Taking advice from experts, we will seek to discover what those suppliers are doing to ensure that none of the workers in their fields and factories are under duress, and what we can do to support those efforts
- Establish monitoring of those high-risk areas, so that the focus is maintained
- Train members of staff who visit suppliers, to know what to look for in identifying the signs of slavery, and what to do if a case of forced labour is uncovered

- Add to our supplier audit template a section on the risks of slavery
- Add to our supplier approval documentation a section on modern slavery. This will communicate to all suppliers – including traders – our commitment to good working conditions for everyone in our supply chains, and also make clear what we require from supplier companies in support of that
- Raise awareness among all our colleagues of the nature of modern slavery, in order to identify other areas of vulnerability. Provide a clear means of reporting any concerns

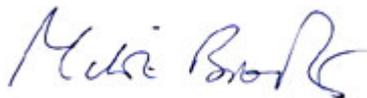
If we find incidences of slavery our supply chains, our priority will be to cause no further harm to the victims. Where possible, we would want to help solve the underlying causes of the problem, liaising closely with the supplier, though if no solution could be reached, we would cease our trading relationship with the supplier over an agreed timescale.

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.

A handwritten signature in black ink that reads 'E. Clark'.

Eileen Clark

Supply Chain Projects Manager

A handwritten signature in blue ink that reads 'Mike Brook'.

Mike Brook

Founder Director

A handwritten signature in black ink that reads 'Jim Twine'.

Jim Twine

Managing Director