



## MODERN SLAVERY POLICY

**This statement is made by Rodo Ltd. It is a statement made in accordance with Section 54 of the Modern Slavery Act 2015 and covers the financial year from April 2019.**

### POLICY STATEMENT

Rodo is committed to ensuring that our business has no involvement in modern slavery or human trafficking. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We know that slavery, human trafficking, servitude and forced labour (Modern Slavery) is a global and increasing challenge for business and Rodo will not support or deal with any business knowingly involved in modern slavery or human trafficking.

At Rodo we recognise the potential risk of modern slavery throughout our supply chain and are committed to working collaboratively with our employees and suppliers to ensure that these standards are continually improving. In order to achieve this, Rodo has developed this modern slavery policy in line with the Modern Slavery Act 2015.

The Modern Slavery Act 2015 consolidates slavery and trafficking offences and introduced tougher penalties and sentencing rules. The act includes provisions to:

- Enable the Secretary of State to make regulations relating to the identification of and support victims
- Make provisions for independent child trafficking advocates
- Close gaps in the law – to enable law enforcements to stop boats where slaves are suspected of being held or trafficked
- Require businesses over a certain size and threshold to disclose each year what action they have taken to ensure there are no modern slavery in their business or supply chain

The latter point is most relevant to Rodo and our suppliers. Therefore, we seek to be proactive in ensuring no slavery in our supply chain and disclose our actions and our supplier actions.

### THE POLICY

Rodo's management define this policy as relevant to the organisation itself, its suppliers and other parties engaged through the supply chain.

To assist in combatting slavery and trafficking, Rodo will carry out risk assessment processes. These activities are in line with internationally acknowledge ETI base code and include:

- Undertaking a supply chain risk assessment
  - We will assess risk using key information such as supplier type and geographical location.
  - We will ensure all suppliers have been audited in line with policy.
- Auditing suppliers



- Our Sourcing and Purchase Manager will carry out on site audits/ inspections of each of our suppliers based overseas. At the moment all Rodo's suppliers are based in China.
- Any potential risks or acts of modern slavery or trafficking will be reported and dealt with in accordance to the relevant policy.
- Ensure suppliers comply with the company policies and all applicable laws in the counties in which they operate. Where standards differ, the standard which offers the greater degree of protection to workers shall apply.
- Wherever possible we seek to procure good and services from an existing supplier already known to Rodo. This allows us to build better understandings of our suppliers and build long term relationships.

Training will be supplied to relevant staff on modern slavery and trafficking. This will enable staff to know the signs and procedures to follow should they become concerned over modern slavery and trafficking within the business or its supply chain.

- Social Compliance Policy. This policy outlines our zero tolerance approach to Modern Slavery of any kind within our operations and supply chain. Our policy sets out the standards we expect of everyone working with us or on our behalf to support and uphold our policy commitments and provides guidelines for employees, partners and agency workers to report any suspicions or concerns relating to compliance with the policy.
- Whistleblowing policy. If there are any concerns relating to Modern Slavery these concerns can be raised in confidence without fear as part of our whistleblowing procedure. Our whistleblowing policy has been modified to take account of the Modern Slavery Act 2015. All reports of Modern Slavery will be fully investigated and appropriate remedial actions taken.

## **MEASURES - KPIs**

In order to monitor the effectiveness of the steps we have taken to seek to prevent slavery and trafficking taking place in our business and supply chains we intend to:-

- Review the effectiveness of our Anti-Slavery and Trafficking Policy and Supplier Code of Conduct;
- Ensure that all key staff are trained in relation to the Modern Slavery Act and slavery and trafficking risks on an ongoing basis.
- Monitor and consider any reports or investigations carried out in relation to modern slavery or human trafficking
- The number of audits carried out on suppliers and any actions taken

We intend to assess these KPIs each year and amend where we feel appropriate in order to provide us with the most effective means of measurements.

This policy will be continuously reviewed by management and supplier adherence will be checked periodically.

If you have any questions or would like to discuss our supplier social responsibility requirements in more detail, please email Laura Brierley at [laurabrierley@rodo.co.uk](mailto:laurabrierley@rodo.co.uk).