



Modern Slavery and Human Trafficking Policy

Introduction

This statement sets out Langridge Organic Products actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chains. This statement relates to actions and activities during the financial year 1st January 2024 to 31st December 2024.

As part of the wholesale supply of organic produce, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Langridge Organic Products Ltd:

- Langridge Organic Products is a wholesaler of fresh and frozen organic produce and organic dairy.
- Langridge Organic has been trading for 30 years and works directly with UK farms and also imports some produce from overseas.

Countries of operation and supply

The organisation currently operates in the following countries:

- United Kingdom- We source the majority of our produce from within the UK. We also supply only to customers within the UK.
- Europe- We source produce from Europe.
- Rest of the World- Certain Produce are only available from certain countries worldwide. For example, bananas from the Dominican Republic, Ginger from Peru, etc.

The following is the process by which the company assesses whether particular activities or countries are high risk in relation to slavery or human trafficking:

Langridge Organic Products Ltd

Company number 02826485 Registered in England & Wales

Units 6, 12,13 & 14 Felthambrook Ind Estate TW13 7DU

TEL: 020 7622 7440

E-mail sales@langridgeorganic.com

www.langridgeorganic.com

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- For all UK farms we would visit the farm ourselves and assess the farm to ensure there are no signs of slavery or human trafficking
- For Europe and other worldwide supply we use a variety of partners who source the produce and organise supply who assess those farms themselves to ensure they are conforming. Those farms that we buy from direct we would visit as per our UK growers.
- We only use agency drivers and warehouse workers where the agency can show the correct policies and procedures for the hiring of their worker's.
- For our own recruitment we do this all-in house. We ensure all people have the correct rights to work within the UK and are paid fairly.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Supply of produce from farms that may use cheap labour to harvest/grow produce and that may encourage the risk of slavery.
- Agency work

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Sam Pearce (Operations Manager)
- **Risk assessments:** As a business the directors are overall responsible for the risk analysis for human rights and modern slavery risk. They may then delegate this to managers to assess and carry out risk assessments.
- **Investigations/due diligence:** Alex Pearce (Director overall responsibility for overseeing all operations) Gavin Lake (Director overall responsibility for overseeing all operations) Justin McPherson (Buyer/General Manager responsible for ensuring produces sources analysis and risk assessments) Sam Pearce (operations manager responsible for ensuring staffing analysis and risk assessments)

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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.

- **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 email office@langridgeorganic.com
- **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 operating abroad and 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. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **[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. We always ensure they have the correct policies and procedures in place.

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Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- 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 the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- creating an annual risk profile for each supplier.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.

Training

The organisation requires managers within the organisation to have a wide understanding on modern slavery and wider human rights/ethics/ethical trading.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.

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- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.

what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Directors' approval

This statement has been approved by the organisation's directors, who will review and update it annually.

Issue No.	Approved By	Signature	Date
01.01	Alex Pearce		03/01/24

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