

# Modern slavery & human trafficking statement

Cambridge Commodities Ltd



**Cambridge**  
Commodities Ltd

nutritional ingredients | product solutions

# Introduction

Cambridge Commodities recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

This statement sets out the company's 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 and in its supply chains.

This statement relates to actions and activities during the financial year 1 June 2017 to 31 May 2018.

## Organisational structure and supply chains

We are a leading supplier of nutritional ingredients to the sports nutrition, health & wellbeing, pet & equine and food and beverage industries.

We have approximately 125 employees working across several different functions within the business. We also engage a small number of agency workers to support during busy periods within our cleanroom and warehouse areas.

We are fundamentally a B2B company supplying nutritional ingredients to both retailers and contract manufacturers.

To enable us to offer high quality and cost-effective products we source ingredients globally.

### **Countries of operation and supply**

Our head office and the majority of our staff are based in the UK. We operate primarily in the European Union and The United States of America and secondarily through partner / distributor arrangements in South Africa and the United Arab Emirates.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- We assess country and industry risk factors such as;
  - Is the supplier based in a high-risk country?
  - Is the supplier based in a country with protected labour rights in place?
  - Is unskilled, temporary and/or seasonal labour likely to be used?
  - Are workers employed via an agency?
- We assess our supplier capacity and risk factors by following a scoring system against the following;
  - Is the supplier a member of SEDEX?
  - If the supplier is a member of SEDEX does the SAQ meet the ethical standards set?
  - Does the supplier have a code of conduct that addresses slavery?
  - Does the supplier have sourcing policies that address slavery?
  - Does the supplier have demonstratable management processes in place to manage the risk of slavery within their supply chain?
  - Has the supplier been identified through third-party audits or other sources as having instances of slavery?
  - Has the supplier signed the company agreement on forced labour?
  - Has the supplier completed training on anti-slavery practices?



### **High-risk activities**

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

- Manufacturing of ingredients in China
- Manufacturing of ingredients in India
- Engagement of temporary/seasonal labour.

## Responsibility

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

- **Policies:** Our Human Resources team are responsible for creating, implementing and reviewing policies and the process by which they were developed. The Board of Directors reviews our policies prior to their release.
- **Risk assessments:** We have a collective group of managers within our Procurement, Quality and Human Resources teams who will conduct risk assessments and analyse the results on a regular basis. Human Rights and the abolishment of modern slavery is high on our agenda. Our Board of Directors is therefore highly involved in supporting new processes and practices to address modern slavery in the workplace.
- **Investigations/due diligence:** Our Operations Director and HR Manager are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** All members of staff at CCL have been provided with awareness training on Modern Slavery within the workplace. Our Procurement, Sales, Quality and Human Resources teams have also been provided with additional training to help tackle and mitigate modern slavery in Global supply chains.

# 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 operations:

- **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 complete our confidential disclosure form which can be found on our website.
- **Employee code of conduct** During our employee induction process employees are taken through our expected behaviours and responsibilities. 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.

# 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 a risk profile for each supplier;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular participation in "Stronger together" and "Ethical trading" initiatives
- Using SEDEX, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

# Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- Requiring staff working in quality, procurement and human resources to have completed training on modern slavery;
- Developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains expected to be completed by 31 December 2018, whereby the organisation evaluates all existing suppliers.

# Training

The organisation requires all staff within the organisation to complete awareness training on modern slavery as a module within the organisation's wider human rights/ethics/ethical trade training programme.

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, 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;
- 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 external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- 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.

# Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises and circulating a series of emails to staff.

The posters and emails explain to staff:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

## Board approval

This statement was approved on 01/11/2018 by the organisation's board of directors, who review and update it annually.



**Finance Director**

**Finance Director's name: Ian Mitchell**

**Date: 18 November 2018**