



TREDERWEN SPRINGS

Trederwen Springs 2008 Ltd
T/A Trederwen Springs
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Company Reg No: 06452544

Modern Slavery Statement

1. Organisation and statement context:

This statement applies to Trederwen Springs 2008 Limited (referred to in this statement as 'Trederwen Springs', 'we' or 'our'), incorporated under the laws of England and Wales under company registration number 06452544.

The information included in the statement refers to the financial year **1st September 2023 to 31st August 2024** (hereafter referred to as 'the financial year') and ensures that all employees working both for and on behalf of Trederwen Springs act in accordance with Section 54 of the Modern Slavery Act 2015.

This statement constitutes Trederwen Springs' human trafficking and slavery policy.

2. Organisation structure:

Trederwen Springs is a privately owned bottling company and operates from its registered office at The Factory, Llansantffraid-ym-Mechain, Powys, Wales, SY22 6SY with no other branches, locations, or divisions. Our products are sold throughout the year to retail and wholesale customers, in addition to offering white-labelling services for other brands. Demand increases in both the lead-up to, and throughout the British summer, and is lower during winter periods.

We have approximately 40 employees in manufacturing, hygiene, logistics, sales, management and clerical roles. Additionally, a small number of agency workers are engaged from time to time throughout the year to meet the demands of the business. All employees and agency workers acting on behalf of Trederwen Springs conduct their work solely within the United Kingdom.

3. Definitions:

Trederwen Springs considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or having restrictions placed on freedom of movement.

4. Our commitment:

Trederwen Springs acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with our requirements under the Modern Slavery Act 2015. We understand that this requires an ongoing review of our internal practices in relation to our labour force and supply chains.

Trederwen Springs does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude, and forced or compulsory labour.

No labour provided to Trederwen Springs in the pursuance of the provision of our services or products is obtained using slavery or human trafficking. We strictly adhere to the minimum standards required in relation to our responsibilities under relevant employment legislation in the United Kingdom and, in many cases, exceed those minimums.

5. Supply chains:

To conduct our activities, Trederwen Springs transacts with a number of third-party organisations. Our main supply chains include those related to the procurement of ingredients and packaging from approved global suppliers.

Trederwen Springs will not knowingly support or transact with any organisation involved in slavery or human trafficking.

6. Potential Exposure:

Trederwen Springs considers its main exposure to the risk of slavery and human trafficking to exist within our external ingredients and packaging supply chain which are sourced globally (and therefore they may involve the provision of labour in a country where protections against breaches of human rights may not be limited), and the supply of temporary staff resources through external agencies.

In general, Trederwen Springs considers its exposure to slavery/human trafficking to be relatively limited.

7. Steps:

Trederwen Springs has not, to our knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

As per Section 54(b) of the Modern Slavery Act 2015, we confirm that we have taken no specific steps during the financial year to ensure that slavery and human trafficking are not taking place in any of our supply chains or in any part of our own business.

We recognise the importance of addressing the risks of modern slavery and human trafficking and are committed to developing a comprehensive approach to these issues in the future. We are currently evaluating our policies and processes to better understand the actions required to mitigate these risks effectively.

Moving forward, we aim to establish and implement measures that will help us identify, prevent, and address any instances of modern slavery and human trafficking within our operations and supply chains.

8. Key performance indicators:

As Trederwen Springs has not yet taken specific steps to address modern slavery and human trafficking in the financial year, we do not currently have key performance indicators (KPIs) in place for these areas.

However, we are committed to developing and implementing KPIs in the financial year 2024/25 to measure our progress in identifying, preventing, and addressing modern slavery and human trafficking risks within our supply chains and business operations. These KPIs will be designed to ensure transparency in our efforts to uphold ethical standards and protect human rights.

9. Policies

Currently, Trederwen Springs does not have specific policies in place to address modern slavery and human trafficking. However, we are in the process of developing comprehensive policies that will guide our efforts in identifying, preventing, and mitigating the risks of modern slavery within our operations and supply chains.

These forthcoming policies will reflect our commitment to ethical business practices and the protection of human rights, setting clear expectations for our employees, suppliers, and partners.

10. Training

At present, Trederwen Springs has not implemented specific training programs related to modern slavery and human trafficking. However, we recognise the importance of educating our employees and stakeholders on these critical issues. We are committed to developing and introducing comprehensive training programs in the near future to raise awareness, equip our team with the knowledge to identify and address potential risks and ensure adherence to our forthcoming policies on modern slavery and human trafficking.

11. Slavery Compliance Officer

The Operations Director is overall responsible for compliance with this policy.

The Technical Manager is responsible for monitoring compliance with this policy. Line managers are responsible for ensuring those reporting to them understand and comply with the requirements of this policy statement.

Compliance with modern slavery has been incorporated into the systems department under the custodian of our Technical Manager who will act as Trederwen Springs' Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action concerning our obligations in this regard.

This statement is made in pursuance of Section 54 of the Modern Slavery Act 2015 and will be reviewed each financial year.

Date of approval: 23rd July 2024

Signed:
Print Name: Michael Njini
Slavery Compliance Officer
Date:

Signed:
Print Name: David Rippon
Operations Director
Date: