

Modern Day Slavery & Human Trafficking Statement

1. Purpose

To ensure all employees that work for and on behalf of Radnor Hills act in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our company human traffic and slavery policy.

2. Scope

This procedure applies to all Radnor Hills employees; covering people, procedures and supply chain.

3. Definitions

For the purposes of this policy:

- **Modern Slavery** includes slavery, servitude, forced or compulsory labour, human trafficking and other exploitative practices.
- **Supply Chain** means every external individual and organisation involved in our products and services, from raw materials and packaging through to distribution.

4. Procedure

It is the responsibility of the Senior Management Team to make sure appropriate measures are in place to ensure all employees at the Radnor Hills site are treated fairly.

Radnor Hills respects human rights and does not tolerate any form of modern slavery. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

This statement sets out actions taken by the company to enable us to understand all potential modern slavery risks related to its business and to put in place steps that aim to ensure that there is no slavery or human trafficking in our own business and its supply chains. The policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This statement relates to actions and activities during the financial year 1st June 2025 to 31st May 2026.

5. Our Business

We are a privately owned Water & Soft Drink Manufacturer based in Wales, founded in 1989. We produce a wide range of products ranging from water to premium pressés for the Food and Drink Sector.

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We have approximately 250 employees in manufacturing, management, and clerical. We also engage a small number of agency workers to support business demand throughout the year. These are generally employed in our manufacturing and packing departments. All labour providers that we work with are required to provide evidence of their legal compliance documentation and we continue to work closely only with labour providers we trust.

6. Our Supply Chain

We procure and buy ingredients and packaging from approved suppliers who source globally. We then produce the products to sell direct to wholesalers and retailers. The company will not knowingly support or deal with any business involved in slavery or human trafficking. All supply chain partners are asked to provide their own Modern Slavery Policy documents as part of our standard procedure.

7. Our Policies and Processes

Our commitment to human rights and modern slavery are captured in a number of policies and protocols throughout the company which are all freely available to employees at Radnor Hills. These include but are not limited to the following:

- **Whistleblowing Policy:** Radnor Hills encourages all of its workers and other business partners to report any concerns related to the direct activities, or the supply chain of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee Code of Conduct:** During our employee induction process employees are taken through our expected behaviours and responsibilities. We strive to maintain the highest standards of employees with conduct and ethical behaviour.
- **Purchasing and Supplier Procedure:** Radnor Hills is committed to ensuring that its suppliers adhere to the highest standard 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. Serious violations of Radnor Hills Supplier Code of conduct will lead to the termination of the business relationship.

8. Due Diligence

Radnor Hills acknowledges that the largest two risk areas in connection with potential modern Slavery is our supply chain for ingredients which are sourced worldwide and supply of temporary workers to site through agencies. As a result, Radnor Hills will be:

- Continuing to train all employees in Modern Day Slavery throughout the Company and ensuring that management are given further training to focus on warning signs and reporting

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procedure. This will continue to be an ongoing measure to ensure that current regulations are met.

- Provide enhanced training for our Procurement Department to continue developing our robust supply chain processes.
- As an ongoing action, all existing supply chains will be reviewed in line with guidelines to ensure compliance.
- Operating an enhanced audit schedule for our trusted labour providers to meet guidelines.

Radnor Hills is committed to operating our business in compliance with all relevant laws and with the highest standards of ethics, honesty, and integrity. This statement is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement.



Simon Knight
Managing Director
Radnor Hills Mineral Water Company Limited
Date: 1st June 2025

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