

RINGTONS

IN OUR FAMILY SINCE 1907

Modern Slavery Statement

Introduction

Ringtons Limited ("the Company") is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps the Company has taken in the financial year ending June 2024 to prevent modern slavery in our business and supply chains and those we are working to implement.

Our Organisational Structure, Business and Supply Chains

The principal activities of the Company are:

- Sourcing, blending, and packing of tea and infusion products for the Ringtons brand and a number of other customers.
- Sourcing, blending, roasting, and packing of coffee for the Ringtons brand and a number of other customers.
- Sourcing gifts and other food or drink products to be sold under the Ringtons brand.
- Retailing products to:
 - UK retailers directly,
 - Businesses (out-of-home) directly,
 - Households directly via sales vans, primarily throughout north and central England.

Our Policies Relating to Modern Slavery

Our policies on respecting human rights, including our Modern Slavery Policy, reflect our intention to act ethically and with integrity in all our business activities and relationships, and our commitment to fully comply with the UK Modern Slavery Act 2015: opposing modern slavery in all its forms and preventing it by whatever means we can.

We have systems to encourage the reporting of concerns by the Company's employees, including establishing a whistleblowing procedure for employees to report any concerns.

RINGTONS

IN OUR FAMILY SINCE 1907

Our Business and Supply Chains: Due Diligence, Identifying and Mitigating Risks

Our staff

We have policies embedded within our business and staff training. Our staff complete modern slavery training during the induction process. This includes information on signs to look out for. We only use approved and audited agency suppliers. We complete random and anonymous worker questionnaires to allow us to gain insight from our employees. These actions allow us to work together, to prevent worker exploitation.

Our suppliers

Ringtons' Sustainability Strategy is seeking to embed human rights and environmental due diligence and mature our due diligence approach. We align ourselves with the United Nation's guiding principles on business and human rights¹, as well as the OECD's guidance on due diligence for responsible business conduct². Following the OECD's 6-step process, we have and are taking actions aligned with steps 1 and 2 – embedding responsible business conduct into our policies and our governance and identifying and assessing the salient risks in our operations, supply chains and business relationships. We also review other industry guidance on responsible business practices, such as the Ethical Tea Partnership's Responsible Purchasing Practices³ guidance. From this, we are identifying areas in which we can strengthen our policy and governance frameworks. One of the benefits of having strong policy and governance is that it ensures that all stakeholders at Ringtons understand the importance of doing business responsibly – from Board level to daily operations.

Our Training on Modern Slavery

We have trained and will continue to train all appropriate staff on the requirements of the Modern Slavery Act 2015 and how to recognise and deal with incidences of modern slavery.

External training workshops run by Stronger Together have been attended by members of multiple departments and we continuously review where more training can be offered.

Our Goals and Key Performance Indicators (KPIs)

Within Ringtons Sustainability Strategy, we commit to respect human rights in our operations and our supply chains.

Between July 2023 to June 2024:

- We created Ringtons Supplier Code of Conduct, capturing our expectations on human rights, environmental protection and compliance with applicable regulation.
- We trained Ringtons' colleagues on the principles underpinning the Supplier Code of Conduct, empowering them to cascade it with their respective suppliers.

¹ United Nation's Guiding Principles on Business & Human Rights:

https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

² Organization for Responsible Business (OECD). Due diligence for responsible business conduct: <https://www.oecd.org/en/topics/sub-issues/due-diligence-guidance-for-responsible-business-conduct.html>

³ Ethical Tea Partnership Responsible Purchasing Practices: <https://ethicalteapartnership.org/responsible-purchasing-practices/>

RINGTONS

IN OUR FAMILY SINCE 1907

- We circulated Ringtons Supplier Code of Conduct to all Ringtons' suppliers, and receipt confirmed.
- We circulated Ringtons Ethical Trade & Human Rights Policy to all Ringtons' suppliers, and receipt confirmed.

Between July 2024 and June 2025:

- We created Ringtons human rights (and environmental) risk assessment for our tea and coffee supply chains.

In our financial year July 2025 to June 2026, we will:

- Identify the salient human rights and environmental risks in our tea and coffee supply chains to Ringtons' business.
- We will present the salient human rights and environmental risks identified via Ringtons Risk Assessment to Ringtons Board.
- We will create a proposal to identify how we might "cease, prevent or mitigate" our salient risks.

If we were to find instances of modern slavery in our supply chains, we would work with our supplier to identify underlying causes and where possible remediate these. If a solution could not be sought, we would cease trading with the supplier. We would prioritise the victims of modern slavery and work to ensure that no further harm would come to the victims.



Elliot Smith

Director

Ringtons Limited

June 2025