



## **Modern Slavery and Human Trafficking Statement**

This statement sets out O'Reilly Wholesale'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 its supply chains. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

As part of the wholesale distribution FMCG sector, O'Reilly's recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Modern slavery and human trafficking is a growing issue globally, mainly due to the rapid rise of global migration. O'Reilly's Wholesale has a zero tolerance approach to Modern Slavery of any kind within our business/supply chain and all members of management and staff at O'Reilly's Wholesale recognise their responsibility to be alert to the risks of Modern Slavery of any nature. Our employees are expected and encouraged to report their concerns, should they arise and ultimately act upon them. We constantly review, update and improve our practices to ensure that we are proactive in tackling slavery and human trafficking in any form.

O'Reilly's 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 O'Reilly's Wholesale, a family run SME which has been trading in this industry for 60 years. We supply confectionary, soft drinks, crisps and snacks, grocery, convenience, health & beauty and household products to the retail sector – shops, CTN's, garage forecourts, hotels, cafe's, licensed trade and other wholesalers.

Our supply chains include the sourcing of materials principally related to the provision of food.

### **Policy Statement**

O'Reilly's Wholesale confirm that:

1. We will not tolerate any form of Modern Slavery;
2. We are committed to acting ethically and with integrity in all our business dealings and relationships;

3. We take seriously any allegations of Modern Slavery in our business and/ or supply chains; and
4. We are committed to constantly reviewing, updating and improving our practices to ensure that Modern Slavery is not taking place in our business and/or supply chains.

We also operate a Whistleblowing Policy for our employees which encourages staff to report any wrongdoing related to the direct activities, or the supply chains, of the organisation which extends to human rights violations like Modern Slavery. The organisation's whistleblowing procedure is designed to make it easy for our 75-85 employees to make disclosures, without fear of retaliation.

The organisation's Employee Handbook makes clear to employees the actions and behaviour expected of them when representing O'Reilly's. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

The organization is committed to ensuring that its suppliers adhere to the highest standards of ethics.

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 processes for slavery and human trafficking

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 organization'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;
- to take 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 using suppliers that can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- to invoke 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.

## Training

The organization requirements include awareness of modern slavery in its induction training carried out by directors and managers, which covers the basic principles of the Modern Slavery Act 2015 and what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.

This statement was approved on 14<sup>th</sup> June 2019 by the organization's directors/principal and managers, who review and update it annually.

Derek J O'Reilly

Managing Director

Date: