

Lintbells Limited Modern Slavery Policy

Last Updated: 14th October 2022

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act (“**MSA**”) 2015 by the offences of ‘slavery, servitude and forced or compulsory labour’ and ‘human trafficking’. Over 21 million people around the world are trapped in some form of forced labour. For this reason, Lintbells Limited (“**Lintbells**”) committed to eradicating human rights abuses and modern slavery from our supply chain and business.
- 1.2 Lintbells opposes Slavery and Human Trafficking and will never knowingly conduct business with suppliers or employees who engage in such practice. This is framed around protecting the human rights of our employees, respecting their rights to non-discrimination, to a safe work environment, to rest and leisure, to fair remuneration and freedom of association. We are committed to the eradication of forced labour and child labour.
- 1.3 Lintbells undertakes assessments of human rights risks in our business and operations to identify where we have exposure to potential for human rights abuse. Where we identify risks, we put controls in place to ensure that we are mitigating risk and work with our partners to reduce the potential for harm. Lintbells also conducts supplier audits of its suppliers. The audits are scheduled and review many aspects of the supply chain including the supplier’s policies towards environment, safety, child labour, quality control measures, slavery & human trafficking and other legal requirements. The audits also include onsite visits to our manufacturers.
- 1.4 Lintbells recognises that raw material procurement in some parts of the world may operate in a higher risk environment. It therefore only acquires raw materials through established parties recognised in its industry who operate quality control regimes and have either their own slavery and human trafficking policy in place or screen their suppliers for ethics and human rights standards. In addition, in its supply agreements it requires the suppliers to certify that materials supplied comply with the laws of the countries in which those companies do business which would include and legislation addressing meet our standards regarding human rights, human trafficking and slavery.
- 1.5 Lintbells recognise that we have a responsibility to take a robust approach to slavery and human trafficking and Lintbells continue to take our responsibility very seriously during the coronavirus pandemic and beyond.
- 1.6 Lintbells 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. Our board of Directors ensures that we as a company are clear on

the policies set and work to ensure that no modern slavery exists within our business or within our supply chain.

2 ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

2.1 This policy covers the activities of Lintbells:

- 2.1.1 Lintbells is a global direct-to-consumer and business-to-business organisation that supplies clinically proven animal supplements to pet owners around the world. Lintbells predominantly operates in the UK and US through our B2B and D2C operational model, increasing our product portfolio significantly in the recent years to support an active life for pets.
- 2.1.2 Our products are manufactured at facilities in the UK and US and are distributed in the UK from our facility in Luton and headquarters in Weston, Hertfordshire and in the US through our 3PL in St. Louis, Missouri. We also operate a 3PL in Stoke, UK and Culemborg, Netherlands.
- 2.1.3 We outsource our logistics in all regions only to the responsible providers and are committed to providing a quality, all round service for our customers and their pets.

3 RELEVANT POLICIES

- 3.1 We have the commitment of our CEO and Board of Directors to take the appropriate steps to ensure that no form of exploitation occurs within our business. Periodically we take reasonable steps to improve our processes over time.
- 3.2 We have a Supplier Code of Conduct, which details the expectations from Lintbells of any partner who chooses to work alongside us. This includes, together with other areas, compliance with our Modern Slavery Policy. We have sourced a questionnaire for Suppliers and Manufacturers which allows us to determine whether they adhere to the same values as ours and are as determined as we are to ensure no exploitation occurs.
- 3.3 Our Ethical Trading Policy ensures that our customers are confident that all our employees and suppliers are treated, fairly, with respect and not exposed to unsafe working conditions. We will only consider suppliers who share our standards and values.
- 3.4 The other Policies Lintbells prides itself on implementing policies across our business and all of which are easily accessible to all employees are:
 - a) Corporate Code of Ethics;
 - b) Recruitment Policy;
 - c) Whistle Blowing Policy;
 - d) Harassment and Bullying Policy.

4 DUE DILIGENCE

4.1 Lintbells undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- 4.1.1 Evaluating the modern slavery and human trafficking risks of each new supplier by way of an approval form and filing copies of any relevant policies sent to Lintbells.
- 4.1.2 Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- 4.1.3 Conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- 4.1.4 Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans
- 4.1.5 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.

5. DIRECTOR APPROVAL

This policy was approved by our directors, who review and update it annually.

Directors' Name: Paul Holmes

Director's signature: 
Paul Holmes (Oct 14, 2022 15:51 GMT+1)

Date: Oct 14, 2022

Documentation

Document Created	By Whom
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25 th May 2021	Jenifer Greenslade
14 th October 2022	Tanya Rogozhina, Head of Legal

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