

Modern slavery and human trafficking statement

Introduction

This statement sets out Complete Coffee Limited's (The Company) 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 our business and its supply chains. As a responsible business, we're committed to upholding internationally recognised human rights through the way we operate. This statement relates to actions and activities during the financial year 1 April 2016 to 31 March 2017.

The Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The Company 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.

The Company's structure and supply chains

This statement covers the activities of Complete Coffee Ltd. The Company was founded close to 90 years ago, and trades in Green and Soluble coffee from Producing countries around the World to our Global clients.

The Company currently operates from offices in Croydon, South London. Although the Company could be said to operate in some high-risk countries, we don't consider any of our activities to be at high risk of slavery or human trafficking because of our knowledge of those with whom we trade and who have been asked to confirm in writing that they, in turn, operate to similar standards.

Risk assessments

Risk assessments for most of our suppliers are done and we require them to confirm that they abide by our Standards. Many of our suppliers have a long-standing relationship with the Company, forming trust and confidence in their practices.

"Right to work in the UK" documents are always checked by the Company for all new employees when they start work. All employees are given an employment contract and are made aware of all internal policies and procedures as well as their statutory entitlements and other benefits.

Due diligence

The Company undertakes due diligence when considering taking on new clients and suppliers, and regularly reviews its existing clients and suppliers. The Company's due diligence and reviews include:

Relevant policies

The Company has a complete suite of policies in place which include the following:

- **Code of conduct**

The code makes clear to employees the actions and behaviour expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour at all times, including when operating abroad and managing our supply chain.

- **Equal Opportunities and Diversity policies**

The Company is committed to providing equal opportunities in employment and to abolishing discrimination in employment and against customers. We are also fully committed to the elimination of unlawful and unfair discrimination and value the differences that a diverse workforce brings to the organisation.

- **Recruitment policy**

The Company 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.

- **Corporate Social Responsibility policy**

The Company believes it is important to have a Corporate Social Responsibility policy and to this end set up The Complete Coffee Foundation, which financially supports schools in Coffee Producing Countries. It also works with other like-minded Organisations.

Training

The Company does not currently require its staff to complete training on modern slavery and no specific training has taken place neither directly within the Company, nor with suppliers and others, to better understand and respond to the slavery and human trafficking risks. The staff are however made aware of the importance of this matter and we are looking to see if it is possible to include something under our BRC Standard Certification. All Directors and Staff have been made aware of our Policy and that it is on our website.

Board approval

This statement has been approved by the Company's Board of Directors, who will review and update it annually.

Managing Director's signature:

Managing Director's name: Ian Breminer

Date: 21st August 2017