

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

### 1. INTRODUCTION

Slavery and human trafficking is a crime and a violation of fundamental human rights and remains a hidden blight on our global society. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Richer Sounds plc is committed to social and environmental responsibility and has a zero-tolerance approach to slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and we expect our colleagues, suppliers, contractors and all other stakeholders to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery. We would never knowingly conduct business with suppliers or employees engaged in such practices. Our colleagues are expected to report concerns and management are expected to act upon them.

### 2. ORGANISATION'S STRUCTURE AND BUSINESS

Richer Sounds is an unlisted PLC 100% owned by Julian Richer, our Founder and MD. We are a retailer of hi-fi, home cinema and TV equipment committed to giving the best value for money and customer service that we possibly can. We trade from 53 stores nationwide, on-line and through our telesales and business to business departments and are extremely proud of our significant reputation for our award winning customer service and renown expertise in TV, Home Cinema systems and premium audio.

### 3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy and Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

The Company's Anti-Slavery and Human Trafficking Policy and Code of Conduct applies to all persons working for us or on our behalf in any capacity, including colleagues at all levels, directors, suppliers and contractors.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes. This year Richer Sounds has amended its Supplier Code of Conduct to include obligations on suppliers to comply with the Modern Slavery Act with specific prohibitions against

the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.

#### **4. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our colleagues, suppliers, contractors, customers and other stakeholders). We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

##### **4a. Our Colleagues**

Richer Sounds complies with the applicable employment laws and are committed to ensure fairness in the hiring and advancement of all colleagues without discrimination. We are proud to be one of the only retailers to be an accredited Living Wage employer and refuse to issue zero hour contracts to our valued colleagues.

All of our colleagues have a personal responsibility for maintaining a respective work atmosphere, free of abusive or unprofessional conduct. Every colleague is expected to respect other people and treat them with dignity and to follow the company's code of conduct and ethics in all business dealings.

Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new colleagues and ensure that we are able to confirm their identities and they are paid directly into an appropriate, personal bank account.

##### **4b. Supply Chains**

Where possible we build long standing relationships with UK suppliers and make clear our expectations of business behavior through our supplier contractual verification processes, the Richer Sounds Supplier Code of Practice and the company's Ant- Slavery and Human Trafficking Policy.

With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We recognise that the small percentage of our goods which are imported from companies outside the UK and EU are potentially more at risk of slavery and human trafficking and we are committed to the continue review of our verification processes to address and eradicate any such risks.

#### **5. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We will use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of internal audits
- Use of labour monitoring and payroll systems; and
- Communication and personal contact within the supply chain and their understanding of, and compliance with, our expectations.

## 6. TRAINING

We provide guidance and training to support colleague understanding of this policy and the risk our business faces from Modern Slavery and Human Trafficking which forms part of the induction process for all colleagues, and for all existing colleagues employed in a purchasing function. Regular refresher training will be provided as required.

This statement is made in accordance to section 54(1) of the Modern Slavery Act 2015 and constitutes Richer Sounds plc slavery and human trafficking statement for the current financial year ending 30th April 2017.



David B Robinson

Chairman

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### 1. INTRODUCTION

Slavery and human trafficking is a crime and a violation of fundamental human rights and remains a hidden blight on our global society. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Richer Sounds plc is committed to social and environmental responsibility and has a zero-tolerance approach to slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and we expect our colleagues, suppliers, contractors and all other stakeholders to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery. We would never knowingly conduct business with suppliers or employees engaged in such practices. Our colleagues are expected to report concerns and management are expected to act upon them.

### 2. ORGANISATION'S STRUCTURE AND BUSINESS

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The Company's Anti-Slavery and Human Trafficking Policy and Code of Conduct applies to all persons working for us or on our behalf in any capacity, including colleagues at all levels, directors, suppliers and contractors.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes. In 2016 Richer Sounds amended its Supplier Code of Conduct to include obligations on suppliers to comply with the Modern Slavery Act with specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect

that our suppliers will hold their own suppliers to the same high standards. A copy of our code of conduct can be obtained by emailing [customersevices@richersounds.com](mailto:customersevices@richersounds.com)

#### **4. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our colleagues, suppliers, contractors, customers and other stakeholders). We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

##### **4a. Our Colleagues**

Richer Sounds complies with the applicable employment laws and are committed to ensure fairness in the hiring and advancement of all colleagues without discrimination. We are proud to be one of the only retailers to be an accredited Living Wage employer and refuse to issue zero hour contracts to our valued colleagues.

All of our colleagues have a personal responsibility for maintaining a respective work atmosphere, free of abusive or unprofessional conduct. Every colleague is expected to respect other people and treat them with dignity and to follow the company's code of conduct and ethics in all business dealings.

Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new colleagues and ensure that we are able to confirm their identities and they are paid directly into an appropriate, personal bank account.

##### **4b. Supply Chains**

Where possible we build long standing relationships with UK suppliers and make clear our expectations of business behavior through our supplier contractual verification processes, the Richer Sounds Supplier Code of Practice and the company's Ant- Slavery and Human Trafficking Policy.

With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We recognise that the small percentage of our goods which are imported from companies outside the UK and EU are potentially more at risk of slavery and human trafficking and we are committed to the continue review of our verification processes to address and eradicate any such risks.

#### **5. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We will use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of internal audits
- Use of labour monitoring and payroll systems; and
- Communication and personal contact within the supply chain and their understanding of, and compliance with, our expectations.

## 6. TRAINING

We provide guidance and training to support colleague understanding of this policy and the risk our business faces from Modern Slavery and Human Trafficking which forms part of the induction process for all colleagues, and for all existing colleagues employed in a purchasing function. Regular refresher training will be provided as required.

**This statement is made in accordance to section 54(1) of the Modern Slavery Act 2015 and constitutes Richer Sounds plc slavery and human trafficking statement for the current financial year ending 30th April 2018.**



David B Robinson  
Chairman



## SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015. It explains the action Richer Sounds has taken, and is continuing to take, to prevent modern slavery and human trafficking throughout its business and supply chains during the year ending 28 April 2019.

Slavery and human trafficking is a crime and a violation of fundamental human rights and remains a hidden blight on our global society. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We would never knowingly conduct business with suppliers or employees engaged in such practices. Our colleagues are expected to report concerns and management are expected to act upon them.

We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain and at Richer Sounds, we are committed to doing everything we can to identify and address it within our business operations and supply chain.

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### 1. KEY PROGRESS 2018/19

- In 2018, we were one of the first high street retailers to join forces with the Slave Free Alliance, a membership scheme created by global anti-slavery charity Hope for Justice. We welcomed their external review of our anti-slavery processes as we wanted to challenge ourselves around this very important issue. Their support has been extremely practical and served to make our policies even more robust.
- We have revised and re-distributed the Richer Sounds Supplier Code of Conduct to our key product suppliers and service providers as a further reminder of the commitment and support we expect from our suppliers in combatting ethical issues such as Modern Day Slavery.
- In a bid to strengthen our supplier ethical risk identification procedures, we have engaged the services and experience of the Ethical Consumer Research Association to conduct a review to enable us to address any areas or gaps for possible improvement.
- We have implemented Tier 2 supply chain risk assessments specifically designed for the minority of our key suppliers who have manufacturing operations in countries which have been identified as posing a higher risk (i.e. China) and we have been working closely with those identified suppliers, to address any high risk areas.

### 2. ORGANISATION'S STRUCTURE AND BUSINESS

Richer Sounds Ltd is a British retailer of hi-fi, home cinema and TV equipment, committed to giving the best value for money and customer service that we possibly can. The company was established in 1978 by our Founder and Managing Director, Julian Richer, who owned 100% of the business until when in

May 2019, Julian Richer passed 60% of his shares in Richer Sounds to an Employee Ownership Trust. Julian Richer continues to play an active role in the company as Managing Director and our colleagues take pride in knowing that they are shareholders, building for the future.

We trade from 53 stores nationwide, on-line and through our telesales and business to business departments and are extremely proud of our significant reputation for our award winning customer service and renown expertise in TV, Home Cinema systems and premium audio. We are delighted to have been awarded the Which? Retailer of the Year Award in June 2019.

The annual company turnover for the financial year ending 28 April 2019 is £168M.

### **. 3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

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The Company's Anti-Slavery and Human Trafficking Policy and Code of Conduct apply to all persons working for us or on our behalf in any capacity, including colleagues at all levels, directors, suppliers and contractors.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes we have implemented a staged roll out of a supply chain risk assessment questionnaire. In 2016 Richer Sounds introduced its Supplier Code of Conduct to communicate the requirement for our suppliers, and their direct supply chain, to comply with the Modern Slavery Act with specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we have continued to review and update the code on an annual basis to ensure its effectiveness. A copy of our latest supplier code of conduct can be obtained by emailing [customersevices@richersounds.com](mailto:customersevices@richersounds.com)

### **4. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

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#### **4b. Supply Chains**

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With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We recognise that the small percentage of our goods which are imported from companies outside the UK and EU are potentially more at risk of slavery and human trafficking. We have implemented risk assessments specifically aimed at identifying any possible risks within these operations and we remain committed to the continual review of our verification processes to address and eradicate any such risks.

### **5. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We will use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of internal audits
- Monitoring of any reports received of possible Modern Day Slavery from our colleagues, supply chain and via the whistle blowing channel
- Use of labour monitoring and payroll systems; and
- Communication and personal contact within the supply chain and their understanding of, and compliance with, our expectations.

In 2018/9 no reports or incidences of Modern Day Slavery were reported, or made known to us, within our operations or direct supply chain.

### **6. TRAINING**

We provide guidance and training to support colleague understanding of this policy and the risk our business faces from Modern Slavery and Human Trafficking which forms part of the induction process for all colleagues, and for all existing colleagues employed in a purchasing function. Regular refresher training will be provided as required.

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**David B Robinson**  
**Chairman**