Modern Slavery Act 2015
Statement and Information Document
Modern Slavery Act 2015 Statement

This statement sets out Tulip Ltd’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 1st October 2015 to 31st September 2016.

As part of the food manufacturing supply chain, Tulip Ltd recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation 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.
This statement covers the activities of Tulip Ltd (www.tulipltd.co.uk), part of Danish Crown (www.danishcrown.com), who are a meat manufacturing company from farm to fork. Primarily a pork based business with farms, abattoirs and processing factories, we supply all the major UK retailers and foodservice customers. We have 15 manufacturing sites within the UK with 6,500 permanent employee’s and approximately 1,500 additional agency workers at peak production time.

We are signatories to United Nations Global Compact (www.unglobalcompact.org) and fully support the United Nations Guiding Principles on Human Rights. Through our Responsible Sourcing Policy we aim to implement these principles within our business and supply chains. We will also further align our work to the Sustainable Development Goals (UN Sustainable Development Goals) over the next year.

We receive pigs from:

- 420 RSPCA Assured finishing farms supplied by Outdoor Breeding farms, and
- 580 Standard Red Tractor finishing farms.

The RSPCA farms will be assured to Freedom Food (RSPCA Assured) & Red Tractor standards. The Standard Red Tractor Farms would be assured to Red Tractor standards only (Red Tractor Standards).

We currently deal with 2,374 suppliers across the group. 73% of these are based in the UK. Our Top 30 non meat suppliers account for 79% of our spend and these are key for us to work in partnership with and support them to improve standards by building their own capacity.
2.0 High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

1. As a food manufacturer we have a heavy reliance on temporary agency labour at our sites. This will be common to other organisations within our supply chain.

2. The farms that supply our pigs to abattoir.

3. Any supplier, especially further down the supply chain where we do not have direct management control.
The risk of slavery and human trafficking ‘within’ our organisation we believe is mitigated as a result of strict policies and good practices within our operations and the knowledge and skills of our staff.

Good practices already embedded within Tulip sites are:

- **Stronger Together**
  - Stronger Together training carried out by all HR Staff
  - Posters displayed on all sites in multiple languages
  - Independent 3rd party whistle blowing hotline
  - Payroll checks on addresses and bank accounts
  - We are also members of the ALP and have hosted training events and seminars on our sites

- **Agency**
  - Modernized annual agency internal audit including interviews of workers
  - Annual 3rd Party agency audit including interviews of workers
  - Primarily one agency across all sites with a Service Level Agreement in place
  - Annual agency worker surveys which include Stronger Together related questions
  - Strong compliance team within the agency and close links to the GLA

- **Sedex**
  - Sedex ([Sedex website](https://sedexglobal.com)) ethical audits on each and every site every 2 years; a number of sites have additional ethical audits in line with separate customer requirements.
  - Pro-active response to address issues before an audit.
  - In July 2016 we had no Sedex non conformances on any of our sites

- **Employees**
  - Trade Unions and Works Councils on all sites and actively support employee engagement
  - Dignity at Work – all employees and workers are expected to work with integrity and respect for each other. Workers receive training in Dignity at Work and free to raise any issues of concern direct to their management team on site or if they have any concerns to utilise the whistleblower line.
  - We undertake bi-annual surveys of employees and develop action plans to implement changes as a result of these.
The standards on the previous page are under the responsibility of the HR Director and the senior team of HR Business Partners.

We consider that the greatest risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control.

- Through our Supplier Agreement Tulip is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the agreement and improve their worker’s working conditions. However, serious violations of our Supplier Agreement may lead to the termination of the business relationship.

Suppliers are required to be members of Sedex and show full visibility of Ethical audits.

As we plan into the future to further prevent the risk of slavery down our supply chain we have recruited a Responsible Sourcing Manager who will:

- Map our full supply chain in early 2017
- Further assess all risk down our supply chain by using the Food Industry Common Labour rights framework in early 2017
- Select 3 of the most high risk product category areas and conduct further ethical due diligence activities to ensure a good understanding of issues and risks in our supply chain
- Write a plan of action to address the key issues raised and support suppliers to improve and monitor the situation
- Monitor all suppliers via the Sedex system for areas of concern
- Formally launch our new Responsible Sourcing policy standards which will be incorporated into the standard suppliers agreements.
- We will design, pilot and implement policies and procedures to improve ethical standards with our farmer suppliers. We will ensure that these can provide practical examples and are workable across all scale of supplier.
- A training programme on Responsible Sourcing for supervisors, within our manufacturing sites, employees of procurement and New Product Development will be designed and introduced by the end of 2017
- A 3rd Party audit document for contractors will also be rolled out to all sites by April 17.

The standards on the previous page are under the responsibility of the HR Director and the senior team of HR Business Partners.
The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- Requiring all workers to receive training on Stronger Together during induction.
- Full training on all aspect of Responsible Sourcing, including Stronger Together to be developed and rolled out to site supervisors, HR, procurement and New Product Development.
- Within our supply chain, all sites with 30 or more employees to have a full SEMTA audit with any gaps filled during 2017.
- Continue to have zero non-conformances (excluding those under dispute) on Tulip Sites from SMETA audits.
- 3rd party audits will have been conducted on any catering, security and hygiene organisation providing outsourced labour to sites.
- Complete initial risk assessment of ethical risk in our supply chain by using the common labour rights framework to categorise key risk areas & define top priorities for action, with defined timescales by end of April 2017. Through this pick 3 of the most high profile product category risk areas and conduct ethical due diligence activities to gain a good understanding of issues / risks in our supply chain and take appropriate steps to address by end of 2017.
- We are in the process of ensuring that all our first level suppliers are linked to us on Sedex and have a valid audit where required.

We will design, pilot and implement policies and procedures to improve ethical standards with our farmer suppliers. We will ensure that these can provide practical examples and are workable across all scale of supplier.

We are in the process of ensuring that all our first level suppliers are linked to us on Sedex and have a valid audit where required.
Board/Member approval

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

[Director’s/Designated member’s/Partner’s] signature:

[Director’s/Designated member’s/Partner’s] name:

STEVE FRANCIS

Date:

29/03/17
Tulip Ltd shall periodically review our Policies in order to ensure its continued adequacy and relevance for our business. The most recent version will always apply.