Modern Slavery Statement For Financial Year 2015/16

This statement is made pursuant to s.54 of the Modern Slavery Act 2015. It sets out the steps that Wessanen UK has, or will, be taking to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Wessanen UK has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

At Wessanen UK, we believe in producing great tasting, healthy food that is better for people and better for the planet. We focus on food and drinks that are healthier for people – organic, vegetarian, natural – and work hard to improve the nutritional balance of our products. We will only sell products that combine delicious taste and nutritional benefit.

As well as championing healthy food, we care about the health of our employees and stakeholders, and the working and living conditions for farmers and producers. We want to protect our living planet for current and future generations. We do this by producing the right food and by conducting our business in a sustainable way.

This approach guides how we develop, market and sell our brands (Clipper Teas, Kallo, Mrs Crimble’s and Whole Earth) and our distribution of Almond Breeze on behalf of Blue Diamond. Our products are made in our own factories or by third party suppliers based in Europe. Our main product sectors include hot drinks, rice cakes, peanut butter, breakfast cereals, cooking ingredients, gluten free products and almond drinks. Our products are sold in the UK and exported globally.

We employ in the region of 130 employees and operate out of two main sites: Camberley and Beaminster.

What We Have Done And Will Do In Future:

We are aware that slavery can occur in any part of the business, including our UK operations or our third party distribution network. However, we believe our highest risk areas are in our raw material supply chains due to their...
origin and geographical location. Further work is required in this area, and as a consequence we have taken, or are in
the process of developing, the following steps to mitigate slavery:

- Benchmarked our current policies, procedures and practices relating to modern slavery and ethical sourcing with
  leading practices and identified gaps
- Updated our Supplier Code of Conduct, readily available for all suppliers (and customers) of the Company, setting
  out our minimum standards and expectations, not only regarding modern slavery and human trafficking, but also other
  ethical matters, including health and safety, environment and corporate ethics such as conflict of interest, data
  protection, anti-bribery and corruption
- Developed a Modern Slavery and Ethical Sourcing Policy demonstrating the Company’s commitment in these areas
- Introduced a more stringent supplier approval selection process including due diligence, pre-audit questionnaire and
  a risk assessment process
- Developed and implemented sourcing guidelines and supplier standard contractual clauses in the Company’s
  supplier agreements that promote the virtues of compliance with the Modern Slavery Act, to compel suppliers to
  implement their own steps to comply with the provisions in their dealings with the Company and other business
  partners
- Promoting awareness relating to the provision of the Modern Slavery Act, and the potential risks facing the Company,
  through internal training and presentations to the employees who are engaged in dealings with the Company’s
  suppliers
- Developing a tool for supply chain audit and verification whereby the Company will regularly evaluate potential and
  existing suppliers before it enters into an agreement and/or renews existing arrangements
- Ensuring that the Company’s recruitment policies, procedures and practices are appropriately designed to minimise
  the risk of human trafficking and modern slavery exploitation
- Conducting regular supplier due diligence by seeking and obtaining written declarations from suppliers confirming
  that they are not only aware of the Modern Slavery Act but have taken, and will continue to take, positive steps to
  address the global problems of human trafficking, compulsory labour, servitude and forced bonded employment and
  will comply with the provisions of the Modern Slavery Act 2015
- Identifying the geographical high risk raw material origins and putting specific plans in place to mitigate slavery
- Following the risk assessment, we will begin working on how to address the risks identified. We will also ensure that
  these risks are reflected appropriately in our corporate risk register.

We have assessed the issue of ethics in our supply chain at a high level in our recently conducted materiality
assessment process and identified it as one of the top seven issues of importance to our stakeholders and to the
company.

**Our Supporting Policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent
manner. These include:

1. Supplier Code of Conduct: This policy sets out, among other policies, the organisation’s stance on modern slavery. It
   states that we do not accept our suppliers infringing any human rights, child labour, slave labour or human
   trafficking in their supply chains.
2. Recruitment Policy: We operate a robust recruitment policy, including conducting eligibility to work in the UK checks
for all employees to safeguard against human trafficking or individuals being forced to work against their will.

3. Whistleblowing Policy: We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

4. Wessanen Company Code of Business Conduct: This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our Suppliers

Wessanen UK operates a supplier policy and maintains an approved supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. This due diligence will, in future, include an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery.

We have conducted on site ethical audits which include a review of working conditions in two of our key suppliers this year. Our modern slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Where possible we work with Fairtrade sources, in particular for tea, coffee and hot chocolate.

In addition to the above, we will in future ensure that our contract with our suppliers is amended to include confirmation that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We will prepare training for our Sourcing/Buying/Auditing teams so that they understand the signs of modern slavery and know what to do if they suspect that it is taking place within our supply chain. We will raise awareness to our employees though company lunch and learn sessions and by publishing articles on our Wessanen UK We Share intranet.

Our Performance Indicators

We are in the process of developing appropriate Key Performance Indicators that will help us measure our progress in addressing the risk of modern slavery in our business and supply chains.

Contact Us:

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