

Modern Slavery Policy

MODERN SLAVERY STATEMENT 2017/18

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1 Definition of Modern Slavery

1.1 “Modern slavery” is a term which covers slavery (where ownership is exercised over a person); servitude (which involves the obligation to provide services imposed by coercion); forced or compulsory labour (which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily); and human trafficking (which concerns arranging or facilitating the travel of another with a view to exploiting them, even where the person consents to the travel).

1.2 We will ensure that we will comply with the Modern Slavery Act 2015 and are putting strict measures in place to ensure that modern slavery is not part of any of our business operations. This includes our supply chains, goods and services. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.

2 Overview

2.1 An overview of our organisational structure, key business activities and supply chains can be found on our website and intranet site.

2.2 We work closely with our main suppliers and customers; with our employees and their representatives to ensure the highest level of compliance with Foods Safety Standards and Ethical Trading Initiatives.

2.3 We embrace socially responsible trading as part of SEDEX (the Supplier Ethical Data Exchange).

3 Responsibilities

- The Senior Management Team of Pioneer Foods (UK) Limited is responsible for overseeing our efforts to help to eliminate modern slavery and for monitoring progress against the key performance indicators (KPIs) contained in this document.
- The Group H R Manager together with the H R Team are responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, and that any agencies used are appropriately checked and commit to ethical standards.
- Managers are responsible for upholding our “core values” and for ensuring that employees who work for them also behave in accordance with these.
- Our supply team is responsible for ensuring that appropriate checks are made prior to placing any orders with new suppliers.

- Our Employee Forum meets each quarter and includes representatives from all areas within our business – modern slavery is on the agenda each quarter

4 Documentation

4.1 We have the following policies in place for employees:

- Business ethics and integrity policy
- Corporate social responsibility (CSR) policy
- Grievance policy
- Environmental policy
- Equal opportunity policy
- Recruitment and selection policy

4.2 Whistleblowing policy These are referenced in our Policy Manual, and copies are available in the production offices, reception and in the H R Office at each site. Policies are also on the Company's intranet site. All policies are updated on an annual basis and we consult with managers and our employee forum prior to updating them.

4.3 Employees are reminded of the policies from time and time, and notified of any updates.

4.4 We have issued all suppliers with our Supplier Code of Conduct

5 Risk assessments

5.1 We consider that the main areas of risk of modern slavery within our business and supply chain are our raw materials in our supply chains.

6 Actions we are taking

6.1 We have undertaken to minimise the risk of Modern Slavery. New suppliers and factories are subject to due diligence via third party accreditations and completion of Supplier Assurance Questionnaires.

6.2 Requesting all suppliers to reveal their Modern Slavery Statement/Policy

6.3 We have taken the following specific actions as part of our drive to eliminate modern slavery. Any employee who has any further suggestions regarding actions that may assist us in our overall aim, or concerns about areas of potential risk, should

raise these with their Manager or a member of the Senior Management Team

7 Employees

7.1 Our recruitment and selection policy aims to assist all those involved in the recruitment process to comply with equal opportunity.

7.2 All new employees are recruited directly, and we conform to the ethical standards set out in SEDEX accreditation. Right to work checks are conducted prior to joining, and we check with all new recruits that they have not been required to pay any fees to gain work with us, and inform them of the procedures that should be followed should they wish to leave our employment. In addition, we check that their passports have not been withheld and that they have not been required to sign any agreements with any third parties in respect of our offer of employment.

8 Agency workers

8.1 Agency workers are used according to the needs to the business and to cope with the fluctuating demands of our business and for cover during peak holiday and sickness periods.

8.2 We will ensure that any recruitment agencies we use confirm that they have put in place appropriate measures to comply with the Modern Slavery Act and require written confirmation from them that no agency worker is being exploited as part of any slavery or human trafficking. Recruitment agencies used will all be on our Preferred Supplier Listing.

9 Suppliers of raw materials

9.1 We embrace socially responsible trading.

9.2 All suppliers are issued with our Supplier's Ethical Code of Conduct which they commit to, and which sets out key minimum standards relating to employment and workers. This has been extended to cover modern slavery. Our supplier contracts have been updated to require our suppliers to commit to taking clear steps to eliminate modern slavery, both within their own businesses and also within their own supply chain (including with anyone with whom they sub-contract).

9.3 Suppliers are required to self-certify their compliance with the code but contractual provisions also include that we may undertake ad hoc site visits, audits and regular monitoring etc. (or to end the contract early, and without penalty to us, in the event of a breach). Contractual penalties may be awarded against any supplier for a breach of contract, or for incorrect self-auditing responses, questionnaires or the giving of incorrect information.

9.4 Where suppliers are not registered members of SEDEX we require that an Ethical Trade Questionnaire be completed by the supplier and a copy of their Modern Slavery Policy submitted.

9.5 We also work closely with our major customers to ensure optimum environmental friendliness and to ensure that our practices and procedures are in line with national standards. Our statement re Corporate Social Responsibility is brought to the attention of our customers via our website and is also displayed in our canteens and reception areas.

10 Penalties for breach

10.1 If a supplier is found to be involved in any form of modern slavery, its contract will be terminated. We will also report any suspicions of criminal activity to the police.

10.2 If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, they will be subject to our disciplinary procedure.

11 Training

11.1 We will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.

11.2 Employees and managers are informed of any updates to our policies via email. H R personnel and the buying Manager have received training on Modern Slavery.

12 Relevant performance indicators

12.1 The following key performance indicators will be used to assess our progress towards eliminating modern slavery:

- all relevant staff to be trained by 30-4-2018
- number of complaints raised through our grievance or whistleblowing procedures
- number of suppliers who are terminated due to allegations of modern slavery
- Working towards 100% of suppliers signed up to our Code of Conduct once written

Signed by:

Name: Jonathon Thorn

Office held: Managing Director

Date: 1st October 2017 Next Review: 30th October 2018

Approved by the Board on 30th October 2017



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