Modern Slavery Statement

Modern Slavery and Human Trafficking Statement (FY17-18)

The Jordans & Ryvita Company, a division of ABF Grain Products,

Associated British Foods plc

Introduction

As a professional and ethically responsible business and employer we recognise that we have a responsibility to take a robust approach to prevent modern slavery and human trafficking. This statement sets out The Jordans & Ryvita Company’s actions to understand all potential modern slavery risks related to our business and the steps we take to try and ensure that there is no slavery or human trafficking in our own business, or our supply chains. This statement relates to actions and activities during the Financial Year 14th September 2017 to 14th September 2018.

Organisational structure and supply chains

The Jordans & Ryvita Company (referred to as Jordans Dorset Ryvita or JDR) operates in the Food Manufacturing Industry. We currently operate in the following countries:

UK – 1 Head Office and 5 Manufacturing sites

  - Australia – 1 Sales Office
  - Canada – 1 Sales Office
  - France – 1 Sales Office
  - Brazil – 1 Sales Office

JDR has a global supply chain, and in some cases we purchase ingredients from extended supply chains involving traders and brokers. We have taken steps to identify high risks in our supply chains and continue to monitor our risk assessments as required.

Sustainability is important to our business in all areas, from the ingredients we buy through to the products we make and how we make them. This business wide focus is manifested through the JDR “Good Food Commitment” which sets out our approach to Corporate Responsibility in relation to the nutritional qualities of the products we manufacture, the ingredients we purchase in order to make those products and the operational processes through which we manufacture those products. We continue to devote two of the four strategic pillars of our Good Food Commitment to responsible sourcing, namely International Supply Chains and UK Cereals (which are the single largest commodity that we purchase by volume.) The work of the Good Food Commitment is sponsored by the board and overseen by a panel of external experts through a Sustainability Governance Committee. We also operate an internal CSR working group to manage the day to day implementation of the Good Food Commitment. In this way we are able to promote sound ethical and environmental standards across the business and capture the latest insights in Corporate Responsibility.
Policies

Our procurement policies and procedures incorporate the appropriate requirements in line with ILO standards; The ETI Base Code and the Modern Slavery Act, as specified within the latest version of the ABF Supplier Code of Conduct. Appropriate training has been conducted with the relevant managers to ensure these policies and processes are correctly implemented. Policies are reviewed annually and where necessary refresher training included for relevant colleagues. This year we have also added an ethical audit policy to our procurement policy standards. This enables us to put greater emphasis on the ethical auditing of our supply chain, particularly in relation to modern slavery. We have communicated the latest version of The ABF Supplier Code of Conduct to all of our raw material suppliers and continue to include this as a provision of supplier approval for new suppliers.

To help us raise awareness and mitigate risk we have a policy titled Preventing Hidden Labour Exploitation in Our Business, this supports us during the recruitment and employment of permanent employees and temporary agency employees. The HR team has responsibility for this policy and it was drafted in accordance with guidance from ‘Stronger Together’.

Our People – Due Diligence

We recognise that our supply chains are not the only area where people may be at risk of Modern Slavery in the context of our business. As such, checks are undertaken within our own business operations to identify any areas of concern associated with shared addresses or bank accounts for existing employees. We have successfully introduced 6 monthly reviews of our modern slavery commitments within the HR team.

When recruiting we follow good practice approaches to identification and our agency suppliers are fully licensed and comply with our Recruiter Compliance Principles. Specific questions have been introduced to our interview templates to encourage conversation about how the applicant heard about the role and whether any money has been exchanged in relation to the role. We recognise that temporary workers are a particular risk group in respect of modern slavery and we work closely with our existing suppliers to mitigate the risk of potential labour exploitation. To enable us to be even more effective we made the decision this year to work with a single agency who works directly with temporary worker suppliers on our behalf (a neutral vending solution, Neuven). This third party works directly with our suppliers, applying thorough auditing and compliance standards which include a focus on ways to mitigate the risk of Modern Slavery. There have been no concerns raised in relation to modern slavery raised since working with Neuven and they have demonstrated they are fully committed to working with us to prevent it.

We have a Whistleblowing Policy which is communicated to all employees via noticeboards and posters. We encourage our people to report any concerns they may have either regarding circumstances that may give rise to an enhanced risk of slavery or human trafficking or to a specific situation which causes them concern. Our Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation, and we have had a confidential whistleblowing hotline in place since 2011, with posters displayed around our sites.

Training and Awareness

Using training material from Stronger Together, employees in our Procurement and HR teams have received tailored briefings on the signs and risks associated with Modern Slavery and Hidden Labour exploitation.

Our Buyers in the Procurement team have been provided with more detailed CSR training including a section on Modern Slavery in order to provide them with a more detailed understanding of this issue and its relevance to their roles. This training is refreshed annually for all relevant employees. As well as formal training, the buying team has been actively involved in the development of supply chain mapping and MSA risk assessment. This year we have rolled out an Ethical Auditing Programme and our buyers have been central to its implementation and success. We will be continuing with this agenda during our next financial year with greater capability being developed in our buying team. A number of our team members are trained on social systems auditing (SA8000 Lead Auditor training). These individuals do not operate as ethical auditors but are using that training to help them understand and assess the information provided by agencies/suppliers.
We continue to build awareness with our suppliers particularly around our ethical audit agenda and our suppliers have been critical to our programme. We have prepared ethical audit awareness materials for suppliers and also share common resources such as SEDEX guides with them.

We have increased awareness on the signs and risks associated with Modern Slavery across our Management, Head Office and Manufacturing populations. We conduct team briefs within manufacturing on an annual basis and have provided specific members of our population, such as those who manage large numbers of employees and our security and reception staff with more detailed briefing sessions. Refresher training takes place annually. The more detailed briefing sessions have resulted in an increased level of awareness and, whilst no specific issues of concern have been identified, we have increased confidence that any concerns will be brought to management attention. We have included a section of this briefing session in the induction slides for all sites to ensure that all new employees are made aware of the risks and what to do should they experience or witness anything of concern.

Our Supply Chains – Due diligence/Risk Assessment

The organisation undertakes due diligence when considering taking on new suppliers and regularly reviews existing suppliers. As part of our standard contractual terms we require all our suppliers to operate to our Terms and Conditions of Purchase, which includes a specific requirement to operate according to recognised ethical business standards. We have also revised our supplier approval process to increase the levels of rigour applied to MSA risk assessment. This has the additional benefit of driving greater awareness of the importance of this issue amongst our supplier community.

For our key suppliers who provide our manufacturing materials, we link to them on Sedex and carry out a review that consists of 3 stages of risk assessment plus remediation and reporting. Our risk assessment includes 1) a high level risk and materiality assessment to identify where inherent risk lies in relation to our brands, 2) supply chain mapping and 3) an ethical audit if required. We use a range of qualitative and quantitative data sources to conduct our risk assessments including but not exclusive to: Sedex, Verisk Maplecroft, BRC and 4 pillar SMETA audit data. A representative from each site has taken responsibility for updating SEDEX to improve the quality and detail of the information.

We continue to conduct high level risk assessments and have mapped all our high risk supply chains, maintaining a focus on those geographies and products which pose the highest risk. Our risk assessment is revised bi-annually and assesses all raw materials across a number of measures including country of origin and processing, the type of industry and the method of procurement. Our supply chain maps have been designed to further unlock this information, asking more detailed questions about our specific supply chains. This process has enabled significantly greater focus on MSA risk and promoted awareness throughout the team.

This year we took additional steps to reduce risk in major sourcing geographies, notably Turkey. In this region we have recruited a locally based ethical auditor and expert to support our ethical agenda in this area. Together with our suppliers we completed an in country risk assessment of our supply chains in this region including visits to farms and NGOs to better understand our supply chain. We will now focus on bringing to life the actions and insights that resulted from this visit.

In addition we have joined a cross industry initiative in Turkey looking to combat labour malpractice in hazelnut supply chains. This is an initiative with the ILO and other business seeking to improve labour standards in this industry.

We continue to review risk in our indirect supply chains and have rolled out a tool to increase the scope of our risk assessments with our indirect suppliers. We monitor and review supply chain risk routinely and have extended our ethical audit agenda considerably this year. We value the input of suppliers in supporting us with this agenda and in addition to the Turkish projects mentioned above we have initiated a project in a Brazil nut supply chain. We also maintain our relationships with external experts and consultants to assess the supply chain, identify remedial actions and reduce risk. While we still have not found any specific instances of modern slavery to date, we maintain our commitment to identify those initiatives that will reduce any risk of it.

Performance indicators/Measurement
To support us in measuring whether the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain are successful we consider:

If any reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified within our business. To date no reports have been received.

If our people have been briefed to identify signs of Modern Slavery and how to report any concerns. To date no concerns have been received.

To date the majority of our UK head office based employees have received either verbal or written briefing. Our manufacturing population, which represents 70% of our workforce, has attended team briefs and nearly 100 employees have attended more detailed training sessions.

A commitment to complete an internal audit reviewing the efficacy of our processes and supply chain risk assessments.

Whether our high priority suppliers have been briefed on both the signs of modern slavery and the requirements of our supply chain risk assessments.

This statement has been approved by the organisation's board of directors. The statement will be reviewed and updated annually.

Director's name: Paul Murphy  Date: 24th October 2018

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