Anti-Slavery Statement

Anti slavery statement for financial year 2016/17

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Suma Wholefoods has taken and is continuing to take 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. Suma Wholefoods 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 within the business or our supply chain.

Our business

Suma is a fully democratic worker co-operative. All co-operative members and employees receive the same gross hourly rate of pay, no matter what their job or responsibilities. We have had a Bakers, Food and Allied Workers Union branch for over 30 years.

We operate from two linked sites in West Yorkshire, and a small hub in London. All workers are based in the UK at one or more of these sites.

Suma is the UK’s largest independent wholefood wholesaler/distributor, specialising in vegetarian, fairly traded, organic, ethical and natural products.

High risk areas for Suma brand products

Having assessed our structures and the supply chain of Suma branded goods, we believe that the areas at highest risk of modern slavery are the growing and harvesting of raw materials. This year we have focused on cocoa as a high risk commodity. Working with our suppliers, and taking guidance from the Food Empowerment Project, we do not currently source any cocoa from West Africa. This presents challenges as around 70% of all cocoa originates from this area, however current advice is that the risk of slavery is too great unless the product is produced by a co-op.

We have been reviewing our tomato suppliers, and conducting traceability on the raw materials that go into our packaging, to make sure that the tinplate in our cans is not sourced from conflict zones.

We have also looked at our coffee supply chain, and are proud to say that all Suma brand coffee is Fairtrade certified, organic, and produced by co-operatives.

We have updated our Ethical Supplier questionnaire, which is sent to all brand suppliers on a yearly basis. We have also started to send this to prospective new suppliers of non-Suma branded goods and services. When we have problems with the quality or practices of Suma brand suppliers we will take appropriate action. This could be working more closely with them to help solve the problem, investing financially to help with training or equipment, visiting them ourselves, sending an independent auditor, or delisting the supplier.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:
I. Modern Slavery Statement. This sets out our stance on modern slavery and explains how members can identify any instances of this and where they can go for help.

II. 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.

III. All new starters are issued with an induction pack stating that ‘whistleblowing’ (as defined by the Public Interest (Disclosure) Act 1998) will not be deemed a ‘Serious breach of Confidence’ under the terms of our Disciplinary and Dismissal procedures.

IV. Buying Policy – http://www.suma.coop/about/ethical-policy/

V. Code of business conduct. Suma Wholefoods is committed to compliance with the Ethical Trading Initiative Base Code which consists of the following criteria:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

Our suppliers

Suma operates a supplier policy and maintains an approved brand supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery, and onsite audits where feasible. All Suma brand suppliers are asked to complete an ethical questionnaire. Our anti-slavery policy forms part of our agreement with brand suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above we require Suma brand suppliers to confirm that:

I. They have taken steps to eradicate modern slavery within their business
II. They hold their own suppliers to account over modern slavery
III. They do not employ children under the age of 15
IV. They pay their employees any prevailing minimum wage applicable within their country of operations
V. We may terminate the contract at any time should any instances of modern slavery come to light

Several of our buyers have attained, or are signed up for CIPS Level 6 Professional Diploma Procurement and Supply, and are CIPS members. CIPS have a strong position on Modern Slavery, which remains a key theme for this global organisation. Members of the team have completed online courses on understanding the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. A member of the Suma Risk / Compliance team is doing a 5 week course on Ending Slavery, delivered by the University Of Nottingham. This training is ongoing, and we are committed to furthering this development.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

I. No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
II. We discover no contra-indications in our due diligence checks around new and existing suppliers.
III. None of our suppliers are featured in campaigns or articles from pressure groups and publications such as The Food Empowerment Project, Ethical Consumer etc. We will actively monitor these publications and groups.
Approval for this statement
This statement was approved by the Suma Management Committee.