MODERN SLAVERY STATEMENT

Weetabix Limited - Slavery and Human Trafficking Statement

1. Introduction

This statement is made by Weetabix Limited (Weetabix) for itself and its parent company, Westminster Acquisition Limited (WAL) (Weetabix and WAL, together defined as Group). It is a statement made in accordance with section 54 of the Modern Slavery Act 2015 (the MSA) and covers the financial year from 1 October 2017 to 30 September 2018 (the Financial Year).

Weetabix and WAL are companies that strive to do things in the right way and we recognise our responsibility to be aware of the risks of modern slavery and human trafficking within our own Group and supply chain.

2. Background

Our Northamptonshire production units currently export to over 80 countries around the world. We employ around 1,200 staff members internationally, with the majority based within the UK, undertaking a range of roles including marketing, sales, manufacturing, finance, IT, HR, strategy and export. We also have employees undertaking sales and marketing roles based in Spain, UAE, China, Ireland and Germany.

We use agency labour in our UK manufacturing areas, which is sourced through reputable recruitment agencies. We also have third party suppliers on site who provide contractors. We outsource certain services where specific expertise may be required and a number of non-key activities, such as engineer support, site maintenance and logistics are also outsourced. Appropriate right to work checks are conducted in partnership with those agencies.

All of the wheat for our core Weetabix biscuit range is grown within 50 miles from our Burton Latimer production units by our Grower Group, which is formed of around 160 farmers dedicated to best practice and responsible production.

Within our direct supply chain, there are 83 different raw material and co-managed vendor parties, and 44 packaging vendor parties. Our indirect supply chain currently consists of 720 active suppliers.

We have carried out a review of our direct supply chain and have concluded that the risks of modern slavery and human trafficking are low. However, we acknowledge that we must remain vigilant to the risks and ensure that our vendors...
understand and play their part in ensuring that modern slavery and human trafficking does not take place in our organisation or supply chains. This message is reiterated to our suppliers via our procurement teams in each supplier quarterly review.

To find out more about what we do, please go to https://www.weetabixfoodcompany.co.uk/

3. Relevant policies and contracts

To reinforce our commitment to combating slavery and trafficking, we have implemented the following policies, which set out our zero-tolerance approach to modern slavery, both within our own operations and our supply chain:

(a) We have in place a Responsible Sourcing Policy which applies to all our operations and those in our supply chain. This Policy makes specific reference to our zero-tolerance stance on modern slavery.

(b) We have reviewed the steps we take when engaging with new vendors, contractors and business partners to ensure that they are aware of and will adhere to our Responsible Sourcing Policy and to assess the likelihood of slavery or trafficking existing in those organisations and what measures are already in place to combat those risks.

(c) We have published guidance to our employees through our internal Anti-Slavery Policy, which applies to all those working for us or on our behalf (and which includes contractors and agency workers).

(d) We have reviewed the steps we take when engaging with new vendors, contractors and business partners to ensure that they are aware of and will adhere to our Responsible Sourcing Policy and to assess the likelihood of slavery or trafficking existing in those organisations and what measures are already in place to combat those risks.

(e) We have reviewed our existing policies and have made amendments to recognise our obligations under the Act including our Whistleblowing Policy.

(f) Our ultimate parent company has also launched our global Code of Conduct policy and which fits with our principles and values here at Weetabix. This Code provides support to our employees in making day to day ethical decisions in addition to the policies already in place.

4. Risk assessment processes

We have considered the risk of modern slavery in our own operations and we have concluded that, on the basis that we are a UK employer subject to UK employment protections and practices and already have well developed checks and balances within our business, we have a low risk of modern slavery occurring in our own operations.

Our suppliers which fall into the following categories are strongly encouraged to commit and adhere to the Weetabix Standards, which include a requirement to abide by the Ethical Trading Initiative base code and to be a member of Sedex:-

- Suppliers of Ingredients to Weetabix.

- Suppliers of Packaging Materials to Weetabix.

- Those involved in the co-manufacturing, co-packing and licensed manufacture of Weetabix Brands.

We have considered the risk of modern slavery occurring in our use of external labour via employment agencies and our direct suppliers. Given the organisations that we work with and the existing checks and balances that we apply in these areas, we have concluded that the risks of modern slavery are low in this area.

We have concluded that we would benefit from a higher degree of oversight in relation to our direct suppliers where the
modern slavery risk is deemed higher and this is an area of focus that we have identified going forward into our next financial year.

5. Due diligence processes

In order to prevent slavery and trafficking in our business and supply chains, we are taking steps to update and improve our supplier due diligence process, particularly in the case of our direct suppliers and any supplier not subject to the Weetabix Standards. This includes integrating and acting upon the findings of our risk assessment processes described above and taking action to embed zero tolerance of modern slavery and trafficking. We are taking the following steps in relation to our supply chain:

- Amending the "Weetabix Standards" to make specific reference to our zero-tolerance stance on modern slavery.
- Reviewing those in our supply chain not subject to the Weetabix Standards, with a view to engaging with those suppliers where modern slavery risks are deemed higher, in order to:
  - set out our zero-tolerance approach to modern slavery;
  - require them to confirm that they will adhere to the principles set out in our Responsible Sourcing Policy;

We review the responses from our suppliers to judge future actions and assess what further due diligence or other steps are required.

6. Training

To raise awareness of slavery and trafficking, and of our policies and procedures, we have developed an induction and continuous learning approach to training employees in this area using our compliance calendar. All compliance modules must be completed by each employee on an annual basis.

We have dedicated compliance modules covering key compliance areas, including Anti-slavery, Anti-bribery, Ethics and Code of Conduct which are compulsory courses for all staff.


In order to monitor the effectiveness of the steps we have taken to stop slavery and trafficking taking place in our business and supply chains, we will use the following performance indicators for the financial year ahead:

- All employees will have completed the relevant training, as referenced above.
- We have issued our Anti-Slavery and Human Trafficking Policy to our workforce through our compliance calendar communication setting out our stance in relation to modern slavery.
- We will establish a process to gain a better oversight of our direct supply chain and consider how best to risk assess, carry out due diligence and communicate with these suppliers in relation to MSA issues. We will consider whether it is appropriate to raise specific questions in relation to slavery and trafficking with these suppliers.
- We will ensure that we continue to refresh and revise our Anti-Slavery and Human Trafficking clauses in our contracts with our suppliers.
- As a minimum (and focusing initially on those suppliers we deem to be higher risk), we will send out to those suppliers
As referenced in this statement, we will monitor the need for further action to be taken and other key performance indicators to be implemented as we continue our risk assessment and due diligence activities and get responses from our key suppliers.

This statement has been approved by the Weetabix board of directors who will review and update it annually.

Signed on behalf of the Board of Directors by Sally Abbott

January 2019