

## Modern Day Slavery Statement 2022 - 2023

### Introduction

Modern slavery is a criminal offence, it is a crime and violation of fundamental human rights. It takes various forms including slavery, forced, compulsory or bonded labour, human trafficking, servitude and child labour. It is not just limited to these practices, all of which deprive a person of their liberty by another person in order to exploit them for commercial or personal gain.

This statement has been published in accordance with the Modern Slavery Act (2015). It details our continued efforts during the financial year April 2022 to March 2023 to understand the risks of modern slavery and take proactive steps to reduce the risks within our own operations and our global supply chain.

As part of the international group Savencia, Savencia F&D UK also commits to its cultures and values. Since 2003 Savencia is a signatory to the UN's Global Compact Scheme and is therefore committed to upholding its ten fundamental principles in the areas of Human Rights, Labour, environment and anti-corruption.

Our business strategies, practices, policies and ways of working are governed by our vision, values and action principles:

- Our vision: "Leading the way to better food"
- Our values: Tolerance, Courage, Honesty, Loyalty
- Our actions principles: Subsidiarity, Collegiality, Autonomy

### Savencia F&D UK structure and supply chains

Savencia Fromage & Dairy UK is a subsidiary of Savencia Group. It employs around 75 permanent people based in two locations:

- The Ham, Westbury, BA13 4HA
- Unit 8/9 Castle Business Village, 36 Station Road, Hampton, TW12 2BX

The Company operates in the maturation, cutting, handling, packing, storage, picking and despatching of British and Continental cheese for the UK market.

The activities considered to be high risk for slavery or human trafficking in Savencia F&D business are:

- External suppliers: suppliers used within the supply chain are SEDEX approved, or from countries regulated by strong employment laws
- Labour: right to work in the UK of any permanent staff is verified and temporary labour is only supplied by Gangmasters Licensing Authority (GLA) accredited and regularly audited companies

## Strategy and Policy

Protecting and respecting human rights and labour standards is one of the foundations of our sustainability and ethical trade strategy.

We continue to develop our approach to deepen our understanding of the risks of modern slavery that are inherent in the food supply chain and engage in positive action to ensure workers' rights are protected and respected. We have several policies that support our work in tackling modern slavery, these include:

- *Ethical Trade Policy*

Our Ethical Trade Policy is based on the Ethical Trade Initiative base code.

- *Supplier Code of practice*

It contains the basic principles of what we expect from both direct and indirect suppliers to Savencia and the minimum legal and ethical requirements they need to meet. These obligations require our suppliers to prevent occurrences of modern slavery in their supply chain and state the specific human rights, labour and social laws, regulations and international conventions which they must abide by.

- *Whistleblowing Policy*

Our Whistleblowing Policy encourages our staff and agency workers to report any concerns related to the direct activities or the supply chains of the organisation that may give rise to an enhanced risk of slavery or human trafficking. The policy is designed to make it easy for workers to make disclosures without fear of retaliation.

- *Employee code of conduct*

Our code outlines the Company's expectations of our employees' actions and behaviour when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour.

- *Recruitment Policy*

It is our policy during the recruitment and onboarding of new employees to ensure that pre-employment checks are carried out to confirm identity and the right to work in the UK. We audit our recruitment agencies to ensure that the same standards are met for all agency workers engaged in assignments for the Company.

- *Equal Opportunities Policy*

Savencia F&D UK is an equal opportunity employer, committed to ensuring that our workplace is free from unlawful discrimination on the grounds of the protected characteristics. The scope of this policy covers all aspects of working life at the Company and applies to all people working within the Company at all levels.

- *Anti-Bribery and corruption Policy*

This policy sets out the applicable rules and principles to prohibit all forms of corruption and provides guidance for their application. The strict and imperative requirements of this policy apply throughout Savencia, to all of our staff and in all circumstances.

- *Grievance Policy*

The aim of this grievance procedure is to ensure that employees who have a problem, concern or complaint about their work, working life, work environment or work relationships are dealt with fairly and without unreasonable delay.

We have reviewed each of these documents and are satisfied they are sufficient to address the issues amongst our supply base and our own workforce.

### **Due diligence process**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain to assess specific products or geographical risks
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Reviewing on a regular basis all aspects of the supply chain

### **Risk Assessment**

Over the course of this financial year, we will continue to reinforce our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

Risk within our operation is low. Where we use agency labour in our operations, we work with a third party to manage agency labour provision, audit agencies and monitor compliance. Risk within our first-tier supply base is low but if we identify specific risk issues in the wider supply chain we work with our first-tier suppliers to understand situation and seek change.

### **Training and Awareness**

The Management Committee Members are trained on "Tackling Hidden Labour Exploitation" to enable them to have the understanding and be able to recognise Modern Slavery and Human Trafficking. It covers the following:

- How to assess the risk of slavery and human trafficking
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios

**Effectiveness Assessment**

We submit to independent third party and Ethical Trade audits, to conduct external reviews to bring insight on ways to tackle slavery and human trafficking.

To assess the impact of the steps we have taken we also track the following key performance indicators:

- Reported incidences of modern slavery in our business and supply chains, and our response;
- Third party ethical audits undertaken on our own brand and exclusive sites;
- Ensure that 100% of all inductions introduce employees to the topic of modern slavery.
- Ensure that 100% of employees who have roles dealing with suppliers, such as the Supply Chain Team receive ongoing updates and notifications regarding business & human rights, and specifically modern slavery.
- Ensure all new suppliers have agreed to the supplier code of conduct.

**Approval**

This statement has been approved by the Management Committee Members, who will review it and update it annually.