

Winterbotham Darby: Modern Slavery and Human Trafficking Statement Financial year April 2019 to April 2020

This statement is in response to the Modern Slavery Act 2015, and sets out the Company commitment to identifying and preventing modern slavery and human trafficking in any part of its business and supply chain.

Winterbotham Darby (WD) is a fast-growing food business that supplies own-label and branded chilled, frozen or ambient foods to the major supermarket chains in the UK, in addition to Food Service and food manufacturers. They source food products from a wide number of manufacturing facilities based throughout Europe.

Winterbotham Darby sites:

- Redhill - Head office & distribution warehouse
- Clitheroe (Lincoln Way) - production of olives and antipasti
- Clitheroe (Twin Brook) - production of pickles and ferments
- Bicester – production of plant-based

The Company commits to developing and adopting a proactive approach to tackling modern slavery and human trafficking within its UK business practices, as well as through risk assessment and due diligence of its supply base throughout Europe.



The supply chain

Winterbotham Darby Redhill has a warehouse and head office with functions including: procurement, technical, product development, marketing, commercial and finance. This company is a supplier of continental products typically produced in manufacturing sites across Europe. The supply base is complex with primary sites being based throughout Europe who procure raw materials from a worldwide supply base. The company uses mapping to give transparency of its supply chains and to understand the human rights risks.

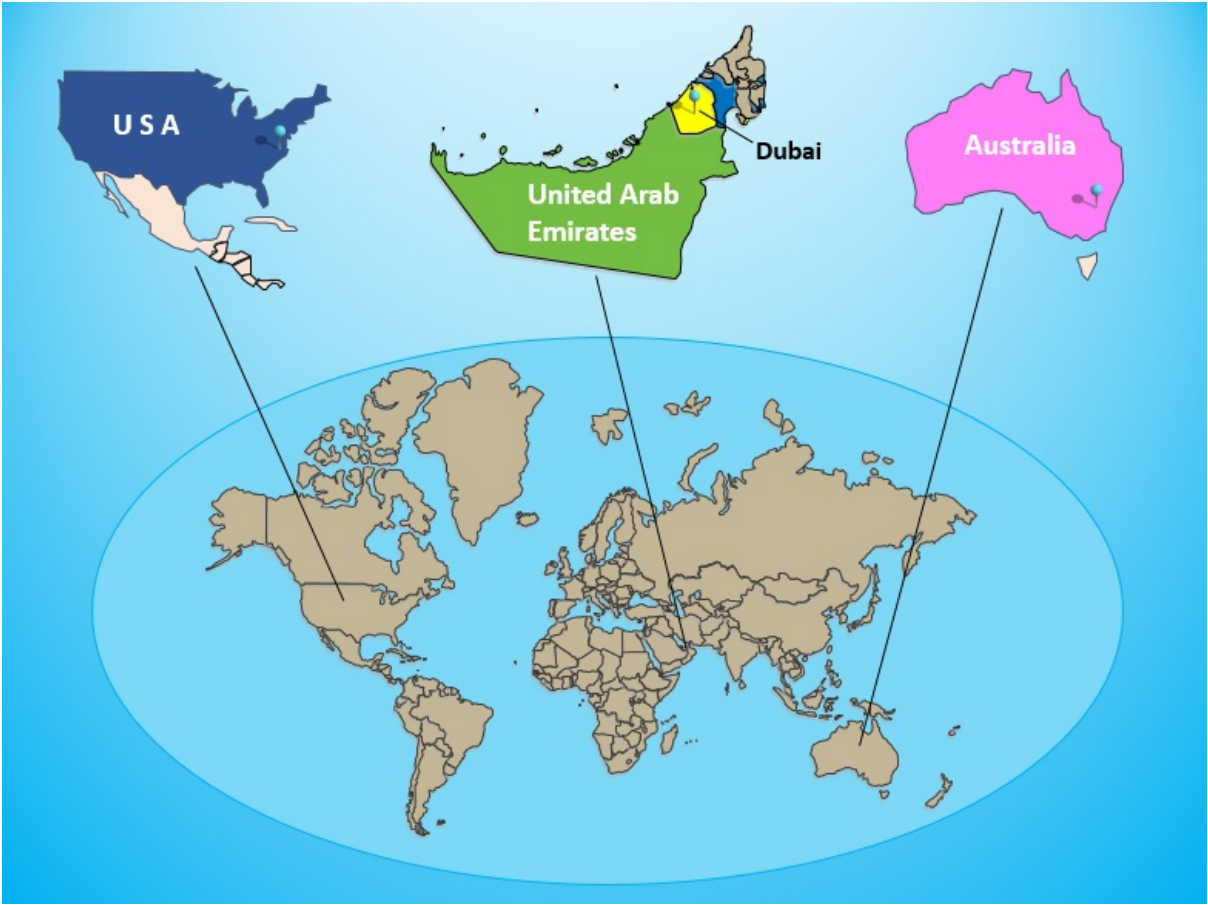
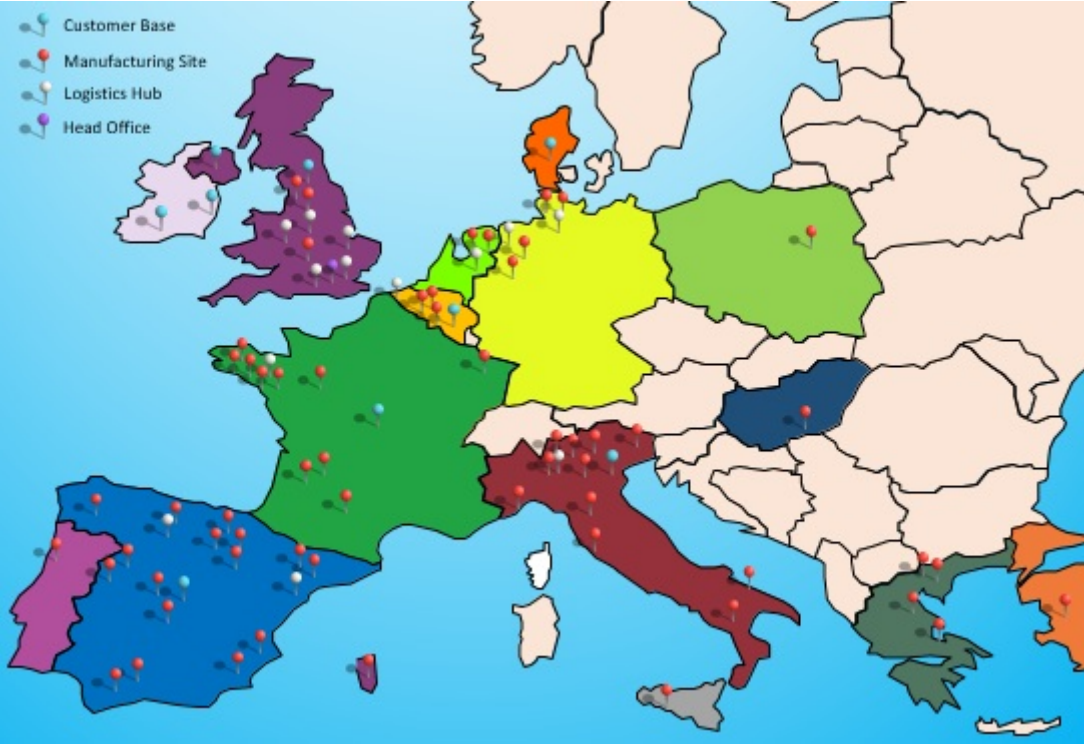
- Winterbotham Darby Clitheroe (Lincoln Way) is a manufacturing site of olives, antipasti and other added value vegetable based product.
- Winterbotham Darby Clitheroe (Twin Brook) is a manufacturing site of pickles and ferments.
- Winterbotham Darby Bicester is a manufacturing site of plant based products.

The manufacturing sites import raw materials from a worldwide supply base for further processing within the facilities.



WINTERBOTHAMDARBY

The ComplEAT Food Group supply chain overview map



Steps to prevent modern slavery and human trafficking

The Company has a Modern Slavery and Human Trafficking policy which sets out the responsibilities, commitments and the procedure to be followed in the event that a case of Modern Slavery or Human Trafficking is suspected.

Risk assessment is regularly undertaken, in line with company policy and with support of external stakeholders, to identify potential risk of modern slavery and human trafficking.

The following protocol is followed to identify and prevent modern slavery and human trafficking in the supply chain:

1. All primary manufacturing partners undergo ongoing risk assessment and auditing of their manufacturing practices, in line with Company policy.
2. Confidential reporting structures for the reporting of modern slavery and human trafficking within the businesses are in place.
3. Where cases of modern slavery and human trafficking are suspected investigations are carried out with the manufacturing facility, and appropriate local authorities.
4. Commencement of supply is reviewed from any aspects of their supply chain where modern slavery and human trafficking is discovered or suspected.
5. Where modern slavery and human trafficking is discovered or suspected the decision to recommence supply with a manufacturing facility will be based on findings of the investigation, and will be risk assessed by the Company, and where relevant the customer
6. All cases of identified modern slavery and human trafficking will be reported:
 - a. According to country specific local law
 - b. Where appropriate, the customer of the final products affected



In addition the company has developed a Human Rights policy. This policy is in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

In 2020 the following ethical policies and records were reviewed:

- Ethical Policy
- Slavery and Human Trafficking Policy
- Human Rights Policy
- Responsible Sourcing Self-Assessment Questionnaire Vegetables and Olives
- Ethical Trading Questionnaire Farms



Implementation within the UK

A multifunctional Modern Day Slavery team was formed in order to embed the fundamental principles of identifying and removing any forms of modern day slavery or human trafficking from within our UK facilities. The team, which includes stakeholders from different departments, has thoroughly analysed the provision and flow of workers within our business and identified areas where they may be vulnerable.

By engaging people from different departments, it has helped us devise policies and procedures best suited to business operations.

This ensures they are both relevant, functional and therefore implemented correctly and in full. The team has a monthly meeting to keep up to date on Ethical issues.

The Modern Day Slavery team has created a business recruitment policy, which details how recruitment shall be performed, the procedure for interview, those staff who should be involved in the recruitment process and details of the written job contract.

Other steps

- Recruiter compliance principles are completed by all employees involved in recruitment. Every month randomly selected workers are required to complete questionnaire on their employment, confidentially, offering them the means to alert the business to any concerns they may have.
- Sites have an Approved Labour Provider List. A centralised template for auditing labour providers has been developed which includes face to face interviews with agency workers. Labour providers are audited annually.
- The company are engaging with the UK labour providers to join the RRT (Responsible Recruitment Tool) scheme.
- The company are members of the **Association of Labour Providers (ALP)**, which provides information and support to all the UK sites.
- The company is currently updating its Modern Slavery processes against the Stronger Together Forced Labour Checklist.
- The company are exploring further down their indirect supply chains to identify vulnerable areas where exploitation could be occurring. Two areas of risk have been identified:
 - Waste and Recycling
 - Warehousing and Logistics
 - To assist understanding of the risks in these areas and to achieve engagement from organisations within these industries the company are members of the IPHR Forum and FNET working groups focusing on these areas.
- Regarding warehousing and logistics the Winterbotham Darby ethical team have been involved in the collaboration between FNET, IPHR and Stronger Together to raise awareness of labour exploitation in this sector. In February 2020 an event was held to engage providers and further collaboration is planned for 2021.



Training



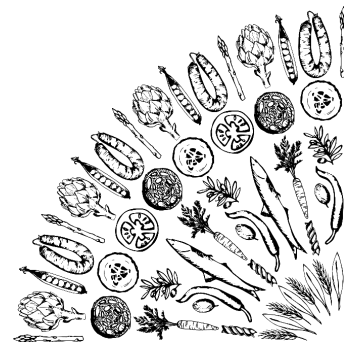
- The Company are members of the **Association of Labour Providers (ALP)**. This resource offers access to specialist training and events which members of the HR and technical functions have attended, for example a workshop on responsible recruitment.

We are also liaising closely with agency labour providers, to encourage their engagement in such workshops and training events to build on their knowledge and understanding of modern day slavery.

- The company induction includes a section on what is Modern Day Slavery, how to spot the signs, and what to do if you are or suspect someone is a victim of modern slavery in the form of a video produced by the GLAA. A Stronger Together Modern Slavery Leaflet is given to each employee as part of their induction pack.
- As of September 2020, at Clitheroe we have also introduced a new online training portal for our employees and made the 'Modern Slavery' course mandatory to all existing managers and supervisors and all new starters in these positions. The course is provided by iHasco and is CPD accredited.

This on line training will also be introduced at Bicester and Redhill sites.

- The company are partners of **Stronger Together** and in 2019, members of the team have attended the following courses:
 - Investigative Interviewing Skills in the Workplace
 - Tackling Modern Slavery in UK Businesses UK Advanced workshop
- The company has worked in 2020 with **FNET** to develop Ethical Checklists to be used by members of the Technical team when visiting a manufacturing site, farm/grower to identify potential human rights risks. This was initially set up to be trialed with the Technical team with training provided by FNET. Due to the Covid-19 pandemic this has been delayed.



European Manufacturing

We are focused on the engagement of the manufacturing base in the issues surrounding modern day slavery and human trafficking.

- All suppliers are required to comply with the company's Ethical Policy.
- To obtain an understanding of the ethical status of new sites before supply commences there is an Ethical section within the New Supplier Questionnaire. This gives initial information which will then be followed by membership of Sedex or Completion of a SAQ depending on the supplier/customer.

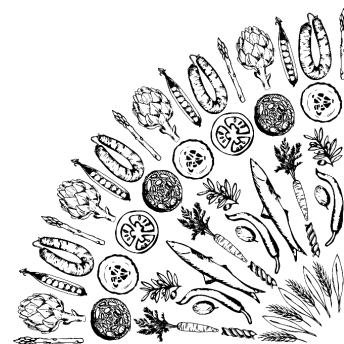


Sedex (Supplier ethical data exchange) is a useful tool to the business helping to identify and mitigate risk within supply chains.

- Sedex provides an initial risk assessment for a supplier taking into consideration known inherent country and industry risks. This allows identification and monitoring of specific high risk products or areas.
- The Company requires all sites that supply UK retailer own brand products to be members of Sedex. Sites must be fully linked to WD, with fully visibility rights of their SAQ and audit information. Sites must have a fully completed SAQ to be reviewed every 6 months.
- Production partners that supply branded lines are required to join the Sedex network, or they complete the Winterbotham Darby Ethical SAQ. 80% of branded sites have completed the Winterbotham Darby Ethical SAQ and 20% are on Sedex.

The company works with a select group of small artisan businesses based in the UK. These business supply products for the company's branded Deli Counter. For these small scale operations, the Winterbotham Darby Ethical SAQ is completed annually.

This year we have implemented an additional questionnaire 'Management Of Labour Providers', to provide further information where a site has a high level of agency labour on site. This was prompted by the Covid-19 pandemic increasing the risk of exploitation of agency labour.



Primary Agriculture and Processing

Further down our supply base, we recognise the need for further education on the fundamentals of modern day slavery and human trafficking. Our supply base consists of hundreds of small growers and farmers and reaching these producers using appropriate communication methods and materials remains a constant challenge. Where applicable we encourage growers to undertake Global GRASP certification, or alternatively join Sedex.



- This year we have collaborated closely with our Turkish growers and as a result they have achieved Global GRASP certification.
- We are also pleased that 85% of our primary processors for olives and vegetables are registered and fully visible on Sedex. All growers and livestock farmers are also required to complete WD SAQs to provide the business with improved understanding of the ethical practices within these supply chains.
- We have developed a risk assessment through which using the data provided from our supplier SAQ's we can identify areas of our producer network that need additional focus and support, and we will continue to build on this over the next year.
- We are members of the **Spanish Ethical Forum**, a network of produce suppliers which aims to discuss the challenges faced by the industry and collaboratively drive on implementing best practice. Our Spanish suppliers of olives have been actively involved in the forum, participating in working groups and presenting best practice case studies to their peers.

Risk Assessment

The scope of the ethical site risk assessment has expanded allowing us to explore risk further down the supply chains. This year we have focused on developing our ethical site risk assessment to incorporate the Tackling Modern Slavery through Purchasing Practices Toolkit. Our branded product suppliers have all been put through this risk assessment, and we have been able to work with suppliers on any areas which have highlighted a potential risk.

By undertaking risk assessment key risk areas have been identified across the business and supply chain. The meat processing sector is complex and has recently been highlighted as having potential to pose a risk to human rights violations

Our next step is to use the risk assessment on our meat processing sites and have already started to collate the information to enable us to do this. Recent reports in the media has highlighted the labour risks within this sector.

The new Sedex 'Radar' risk assessment tool will be used across the relevant sites to evaluate key human rights risks. This is following the release of the new Sedex SAQ which sites have been completing.

We had previously highlighted that the agricultural supply chain could pose a risk to human rights violations. This is because of the seasonality, short harvest window and harvesting methods employed often in some of our supply chains in Italy, Morocco and Turkey. We therefore continue to work with our suppliers to gather information to understand the potential human rights issues.



Audits

The company work with a team of global independent auditors to conduct ethical audits. Local auditors who are familiar to the laws, working practices and language of the country where the audit is taking place are used. Audits consist of observations from a site tour, paperwork reviews, confidential employee interviews and management interviews.

- In the financial year 2019/2020 ethical audits were carried out at 23 manufacturing sites. The Covid-19 pandemic meant that some site audits had to be rescheduled.
- Six of our key olive and antipasti processors have also undertaken a 3rd party ethical audit in the year. In addition to this Winterbotham Darby have carried out seven audits of primary processors of olives & antipasti.

If a non-conformance is identified, the company aim to work together with sites and certification bodies to implement sustainable solutions to resolve these issues.

The company have joined the Sedex SMETA 7.0 working group to be involved in the development of the new audit standard which are sites will be assessed against.

Audit non-conformances are trended to highlight common areas, which require focus. Best practice guides have been written on key areas and communicated to sites, encouraging business to internally review their procedures against these suggestions, with the aim of driving sustainable change.

The scale, complexity and seasonality of our supply base of primary growers and farmers, means that specific independent audits are not always possible. Therefore additional ethical compliance questions have been incorporated into the standard WD visit template, so this data can be captured whenever a site visit is undertaken.



Collaboration

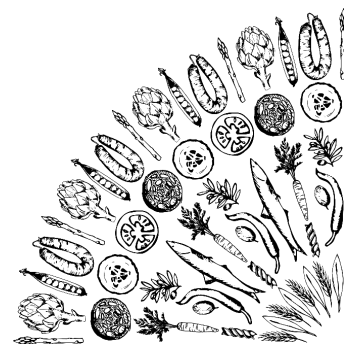
The Company acknowledges that the most powerful means of driving sustainable change within global food supply chains is through collaboration and the collective leverage of the food industry as a whole.

- The Company including the UK manufacturing sites are business partners of **Stronger Together**, a multi stakeholder initiative aiming to reduce modern slavery, particularly hidden forced labour, labour trafficking and other third party exploitation of workers. As business partners we provide evidence to publicly demonstrate the business's commitment to tackling hidden labour exploitation.
- The Company is a member The **Food Network for Ethical Trade (FNET)** which has been established to improve human rights in global food supply chains through a common approach to managing ethical trade. It aims to support suppliers to identify, manage and respond to global food supply chain ethical trade risks, to improve the food industry's understanding of ethical trade, to identify and facilitate collaboration opportunities, to promote trust and build a forum for sharing issues and challenges and, in the longer-term, to support the food industry to focus on promoting human rights in global food supply chains.
- The company is a member of the **Sedex Stakeholder Forum (SSF)**, which brings together manufacturers, brands, retailers, NGO's, auditing bodies and industry experts to discuss challenges in ethical trade and responsible sourcing and solve these problems collaboratively.
- As member of **FNET, IPHR Forum and Spanish Ethical Forum** the company is able to collaborate and gain understanding of this risks in the supply chain.
- The company are members of **Association of Labour Providers (ALP)** which provides information and support for all the UK sites.

During the Covid-19 pandemic these organisation have provided valuable resources to stay updated in the ever changing situation through regular call updates and webinars. The pandemic has increased the potential for labour exploitation.

The Company are actively engaged with our **retail customer ethical teams**. Supporting best practice groups and guidance workshops.

Throughout 2020/2021 we envisage continued active involvement in such collaborative working.

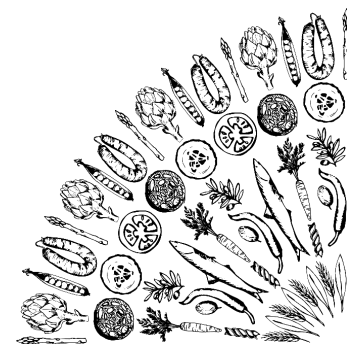


Achievement of objectives

In order to assess the effectiveness of the Company's work to tackle modern day slavery within the supply base the following KPIs are routinely monitored:

Key performance indicator	Result 2019/2020	Target 2020/2021
% whistleblowing issues related to Modern Slavery all sites supplying Winterbotham Darby	0%	n/a
% whistleblowing cases closed out all sites supplying Winterbotham Darby	100%	100%
% Sedex and WD SAQ completed for all sites supplying WD	100%	100%
Number of Critical non-conformances raised during SMETA audits all sites supplying Winterbotham Darby	0%	0%
% of UK labour providers audited annually for Winterbotham Darby UK sites	100%	100%
Modern Slavery Induction training of all workers including agency at Winterbotham Darby UK sites within 1 week	100%	100%

- At each UK site there are suggestion boxes, which are checked fortnightly.
- Works committee meetings take place between 3-6 times per year at UK sites.



Ethical objectives 2019/2020 overview

1. Update the ethical risk assessment against Stronger Together 'Tackling Modern Slavery through Purchasing Practices Toolkit'

The new risk assessment has been completed and all branded manufacturing sites have been inputted. Next slaughterhouses and cutting plants will be added into the risk assessment

2. Update the Modern Slavery processes against Stronger Together 'Forced Labour Checklist'

Work has commenced on the checklist but due to changes at the Bicester site and the Covid-19 pandemic this work has been delayed.

3. Warehouse and Transport suppliers to engage on human rights risks through FNET working group

A collaboration was formed between FNET, IPHR Forum and Stronger Together to raise awareness of labour exploitation risks in the Warehouse and Logistics Sector. An event was held in February. The scope and objectives of this collaboration is being agreed. Further events are planned.

4. Recycling and waste suppliers to engage on human right risks through IPHR Forum working group

A working group with recycling/ waste providers, retailers, manufacturers, government agencies and NGO's has been formed. The objectives for the group have been agreed. Potential for an event with collaboration from other human rights groups.

5. UK labour providers to join Responsible Recruitment Tool Kit

Both agencies for Clitheroe have joined the Responsible Recruitment Toolkit and completed the checklist. Bicester's main agency have also joined.

Implementation of GRASP for strategic growers

Implemented GRASP with Turkey. We will continue to encourage strategic growers to obtain GRASP certification.

6. Engage our Spanish Growers on Human Rights risks through membership of the Spanish Ethical Forum and Stronger Together Spanish Project

Key Spanish growers regularly involved in the forum attending grower workshops.

7. Raise awareness of Modern Slavery across all 3 UK sites by arranging training with an external specialist for all key personnel

Training was being planned however due to the changes at Bicester site and the impact of the Covid-19 pandemic this has been delayed.

8. Improve Worker Representation across UK sites through involvement of FNET working group

the group is sharing and developing best practice. Whistleblowing policy guidance is under development and this will be a great resource to review our Whistleblowing policy covering all UK sites. We could also use this as guidance for our European sites.

9. Development of an Ethical checklist to be used by the Technical team when visiting manufacturing sites, growers and farms. Training to be provided on the checklist by FNET.

The check lists have been developed but the training and trial of these has been delayed by the Covid-19 pandemic.



Objectives for 2020 – 2021

- Develop a Winterbotham Darby Ethical Risk Assessment for service providers
- Implement an annual review of the service and audit quality of audit bodies
- Slaughterhouses and cutting plants be added into the Winterbotham Darby Ethical Risk Assessment
- Update the Modern Slavery processes against Stronger Together 'Forced Labour Checklist'
- Warehouse and Transport suppliers to engage on human rights risks through FNET, IPHR Forum and Stronger Together working group collaboration
- Recycling and waste suppliers to engage on human right risks through IPHR Forum working group
- Ensure all UK labour providers are members of Responsible Recruitment Tool Kit
- Continue to encourage strategic growers to obtain GRASP certification.
- Continue to engage our Spanish Growers on Human Rights risks through membership of the Spanish Ethical Forum
- Raise awareness of Modern Slavery across all 3 UK sites using the online Modern Slavery Course provided by iHasco which is CPD accredited.
- Improve Worker Representation across UK sites through involvement of FNET working group
- Implement the Ethical Technical Checklists for visits to manufacturing sites, growers and farms
- Site HR teams to attend Stronger Together Tackling Modern Slavery in UK Business Advanced workshop
- To appoint Modern Day Slavery Champions throughout the workforce in accordance with Stronger Together initiatives
- Modern Slavery questionnaire to evaluate the effectiveness of awareness initiatives

Signed:



Steven Higginson on behalf of the board of directors of Winterbotham Darby

CEO

Date: 20th November 2020

