

## Winterbotham Darby: Modern Slavery and Human Trafficking Statement. Financial Year April 2021 to April 2022

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. The business is part of The Compleat Food Group.

- Redhill - Head Office and distribution warehouse

Compleat food group – Deli and Plant based Division

- Clitheroe (Lincoln Way) - production of olives and antipasti
- Clitheroe (Twin Brook) - production of pickles and ferments
- Bicester – production of plant-based products
- Milton Keynes – finishing and packing of plant-based products

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 company follows the requirements of the Ethical Trade Initiative (ETI), requiring all suppliers to comply with this.

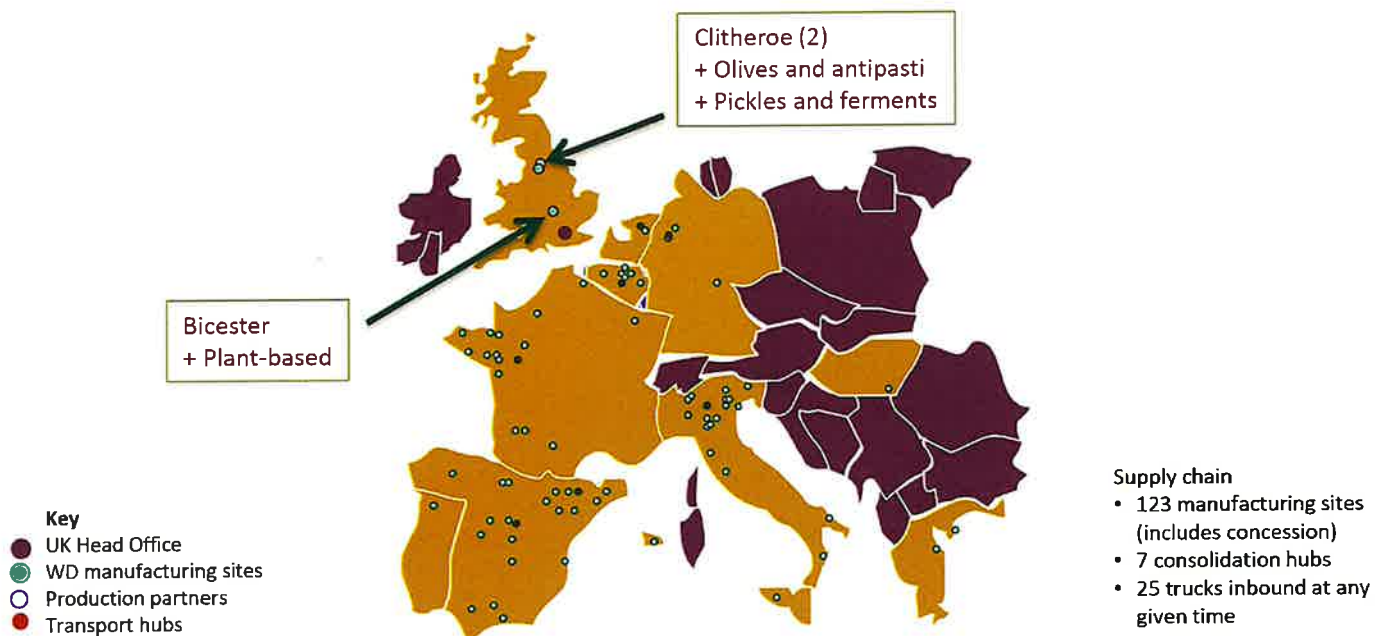
### The Supply Chain

Winterbotham Darby has a warehouse and office in Redhill with functions including: procurement, technical, product development, 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.

Compleat food group – Deli and Plant based Division

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

The manufacturing sites import raw materials from a worldwide supply base for further processing



within the facilities.

## Winterbotham Darby 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 re-commence 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 a Human Rights policy, written in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

## Implementation within the UK

A multifunctional team was formed in order to embed the fundamental principles of identifying and removing any forms of modern day slavery or human trafficking 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 potentially be vulnerable.

By engaging colleagues from different departments, it has helped devise policies and procedures best suited to the business operations. This ensures policies are relevant, functional and implemented correctly. The team has a monthly meeting to keep up to date with Ethical issues.

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

### Recruitment

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. All labour providers are audited annually. All Labour Providers used have a GLAA Licence and are members of Stronger Together.

The company is also engaging with the UK labour providers to join the RRT (Responsible Recruitment Tool) scheme.

The company are also members of the Association of Labour Providers (ALP), which provides information and support to all the UK sites.

## **FoodFarmHelp**

FoodFarmHelp was set up as a collaboration to develop guidance for the food, horticulture and agriculture industries to better manage risks associated with the Covid-19 pandemic. We are signed up for weekly updates to keep up to date on what is happening in the industry.

The company is currently updating its Modern Slavery processes against the Stronger Together Forced Labour Checklist.

The company is 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.

On warehousing and logistics the WD ethical team have been involved in the collaboration between FNET, IPHR and Stronger Together to raise awareness of labour exploitation in this sector.

In October IPHR Forum held a webinar on the Modern Slavery Risks in Waste and Recycling and this launched the toolkit developed to help identify the risks.

## **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.

Liaising closely with agency labour providers, to encourage their engagement also 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. Stronger Together Modern Slavery Leaflet is given to each employee as part of their induction pack and are also displayed around site.



Training made *simple*

As of September 2020, Clitheroe have introduced a new online training portal 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.

The course includes: different types of modern slavery, case studies from high-risk industries, how to spot the signs, how to report any concerns or suspicions, compliance with the Modern Slavery Act, working practices and policies and the organisation's supply chain. The course is available in 26 languages, which makes it accessible for everyone.

This training will also be introduced at all other UK sites.

## Courses attended

The company are partners of Stronger Together and in 2021, members of the team have attended the following courses:



- Investigative Interviewing Skills in the Workplace
- Tackling Modern Slavery in UK Businesses UK Advanced workshop
- Stronger Together Tackling Modern Slavery in UK Businesses 28/09/2021 (Clitheroe)
- Coop – Modern Slavery Risk Management in 2021: Practical steps and current risks 28/10/2021

The company has worked 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 will be initially trialed with the Technical Team following training in 2022.

## Anti-Slavery Day - 18/10/2021

To mark Anti-Slavery Day 2021, a communication was sent out to all staff which included guidance on what is modern slavery, how to spot the signs of modern slavery and also included the GLAA produced Modern Slavery video. Going forwards, this is something we will mark each year to raise awareness.





## 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 WBD, 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 WBD Ethical SAQ. 74% of branded sites have completed the Winterbotham Darby Ethical SAQ and 26% are on Sedex.

## 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 out to 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. We are also pleased that 80% 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 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.*

Our ethical site risk assessment incorporates the Stronger Together Tackling Modern Slavery through Purchasing Practices Toolkit. All our branded product suppliers that are not on Sedex are put through this risk assessment. This gives each site an overall risk rating and we then work with suppliers on any areas which have highlighted a potential risk.

The meat processing sector is complex and has been highlighted as having potential to pose a risk to human rights violations

Following from the risks highlighted last year in the meat processing sector, this year we have included the cutting plants and slaughterhouses used in our supply chains into our risk assessment. We have worked closely with this function of our supply chain to encourage the participation in Sedex and the requirement for transparency in worker information.

We have been using the updated Sedex 'Radar' risk assessment tool to evaluate key human rights.

In January following the announcement of the UK government that British organisations are not be complicit in nor profiting from human right violation in Xinjiang, we checked the sourcing of ingredients in all our products.

Where ingredients have been found to be sourced from this region the suppliers of these have switched to alternative sources. To focus on sourcing from China we have now added a question to our New Supplier Questionnaire requesting the specific region where raw materials are sourced from China. Also on all our product/ ingredient specifications the specific region of China must be stated.

## 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 2021/2022 ethical audits were carried out at 18 manufacturing sites. The Covid-19 pandemic meant that some site audits had to be rescheduled.

In addition to this 2 of our key olive and antipasti processors have also undertaken a 3<sup>rd</sup> party ethical audit in the year, and 4 of our farm assured slaughter houses.

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 WBD visit template, so this data can be captured whenever a site visit is undertaken.



## COLLABORATION

We're committed to working collaboratively to help increase our effectiveness in tackling modern slavery. We're active members of the Sedex and FNET (Food Network on Ethical Trade) and play an active part in other collaborative working groups across the industry and more widely.

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.

### Stronger Together

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.

### FNET

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. This year the company is a member of the Raw Materials working group and has recently joined the new Agents group.

### IPHR

The Indirect Procurement Human Rights (IPHR) Forum is a group of UK retailers, brands and manufacturers with a common vision to protect and respect human rights in supply chains (for goods and services not for resale) and address shared risks.

Winterbotham Darby are an active member and are part of the Waste and Recycling Working Group.

The Waste & Recycling Working Group is a cross-sector network of over 20 organisations. In 2021, the objectives were to identify and assess labour rights issues, develop shared resources to address human rights issues in the sector, and to raise awareness and engagement. The collective commitment from members of the group enabled great progress and they developed a brand new *Tackling Modern Slavery in Waste and Recycling* toolkit. This was launched on 18th October 2021, with a webinar to mark Anti-Slavery Day.

## SSF

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 these organizations we are able to collaborate and gain understanding of the risks our supply chains.



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.

## Progress against our 2020/21 targets

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 2020/2021	Target 2021/2022
% whistleblowing issues related to Modern Slavery all sites supplying WD	0%	n/a
% whistleblowing cases closed out all sites supplying WD	0%	100%
% Sedex and WD SAQ completed for all Tier 1 sites supplying WD	82%	100%
Number of critical non-conformances raised during SMETA audits all sites supplying WD	5%	0%
% of UK labour providers audited annually for WD UK sites	100%	100%
Modern Slavery Induction training of all workers including agency at WD UK sites within 1 week	100%	100%

- At each UK site there are suggestion boxes which are checked fortnightly and works committee meetings take place quarterly.

What We Said We Would Do	How Have We Done?	What Have We Done?
Develop a WD Ethical Risk Assessment for service providers	Behind Schedule	The Risk Assessment has been drafted , next steps will be to run suppliers through this
Implement an annual review of the service and audit quality of audit bodies	Behind Schedule	Due to Covid-19 audits have been delayed therefore we have not implemented this. Within the next 18 months we will review audit bodies performance
Slaughterhouses and cutting plants be added into the WD Ethical Risk Assessment	On Schedule	All Farm Assured slaughterhouses and cutting plants have been added into the WD Ethical Risk Assessment
Update the Modern Slavery processes against Stronger Together 'Forced Labour Checklist'-	Behind Schedule	Due to Covid-19 progress has been delayed on working through the checklist again January
Warehouse and Transport suppliers to engage on human rights risks through FNET, IPHR Forum and Stronger Together working group collaboration	On Schedule	UK Providers have been encouraged to take part in events arranged this year by FNET, IPHR Forum and Stronger Together collaboration
Recycling and waste suppliers to engage on human right risks through IPHR Forum working group	On Schedule	Our provider for UK sites has been involved in the IPHR Forum Waste and Recycling working group

## Our 2021/22 objectives

### UK MANUFACTURING

- Implement the WD Ethical Risk Assessment across all Service Providers and Goods Not For Resale
- Update the Modern Slavery Processes against the Stronger Together Forced Labour Checklist
- Review the labour provider audit

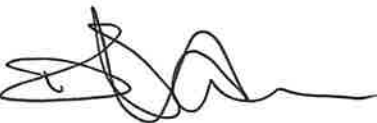
### AUDITS

Implement an annual review of the service and audit quality of ethical audit bodies

### COLLABORATION

Participate in the FNET Agents working group to identify human rights risks from sourcing countries common among the group and ways to manage these risks

Signed:



Damian Shaw on behalf of the Board of Directors of Winterbotham Darby

CEO

Date: 26-1-22.