



Dunbia Statement of Compliance - Modern Slavery and Human Trafficking Statement for the Financial Years 2015 – 2016

This statement is made in response to Section 54, Part 6 of The Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. This statement relates to actions and activities during the financial year 1st April 2015 to 31st March 2016.

Our Business Model

Dunbia is a multinational food company specializing in the production of quality beef, pork and lamb products with 11 sites across the UK and Ireland, and employing over 3600 employees. The desire to create better food naturally is the driving force behind everything we do, and our business model adopts the principles of quality, integrity and customer satisfaction.

Responsibility

Ongoing responsibility for the organization's anti-slavery update is the Board of Directors who will ensure that the statement is published annually and accurately reflects the organization's measures and initiatives to tackle slavery and human trafficking. The Group Human Resource Department and the site HR Managers are responsible for introducing policies and reviewing the process by which they are developed. The HR and Learning & Development Teams are responsible for the cascade of information throughout the sites. They have also facilitated the training to the wider business.

Our Supply Chain

Our supply chains include the sourcing of raw materials principally related to the provision of food. The manufacturing supply chain is one of the most complicated of any industry, with several levels of suppliers between a producer and the source of raw materials that enter the manufacturing process.

Our Standards

Dunbia is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. We hold ourselves and our supply chain accountable and we fully comply with the provisions of the Modern Slavery Act 2015.

Within our supply chain process we are setting standards to ensure that all of our immediate suppliers will all sign up members of SEDEX (Supplier Ethical Data Exchange) and that they complete a SEDEX SAQ as part of their relationship with Dunbia.

All of our sites have adopted the Ethical Trade Initiative (ETI) base code and we report monthly KPIs against key ETI measures. In addition, all sites have completed a SEDEX SAQ and are audited, as required, by third parties who publish our audit results on the SEDEX database.

Our sites have embraced the Stronger Together Programme and support the work being done to reduce forced labour and human trafficking in the UK.

All of our providers of temporary labour are members of SEDEX and the Gangmaster License Authority (GLA).

To further underpin our compliance, in the last twelve months we have set up a dedicated Ethical Steering Group in Dunbia.

Risk assessment and Areas of identified Risk

The largest risk in our supply chain lies with our Labour providers, as the numbers of temporary workers can rise to circa 800 per week in the peak times across our sites. In addition to those measures already described we have also adopted a policy to ensure our largest suppliers of labour are audited against the ETI Base Code. Our Corporate Chaplin provides an Employee Wellbeing service which extends to frequent, informal conversations with employees and agency workers on all sites covering welfare and any other issues employees wish to discuss on a confidential basis. .

Capability and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided awareness raising to all existing employees, and all new employees joining the organisation now complete training on Modern Day Slavery as a module within their Induction Programme. As part of the training, we also show the Stronger Together video at all Induction sessions and at each refresher training session.

In 2016 we embarked on an education awareness campaign across all sites to introduce senior management and relevant personnel to The Modern Slavery Act and our responsibilities therein. In December 2015, we also devised and implemented an Ethical Trading Policy & Procedure which demonstrates the company's commitment to acting ethically and with integrity within all of our Supply Chains.

Our HR Teams have been externally trained in the exploitation of human labour and we have worked with the GLA and Association of Labour Providers (ALP) to provide in-depth training to key personnel within the business.

All employees have mechanisms to increase the visibility of issues, for example through our confidential multi language, worker hotline – 'Speak Out'.

We regularly attend industry conferences and meetings.

Monitoring and reporting Mechanisms to Report Modern Slavery and Human Trafficking

Dunbia has a Whistleblowing Policy and Procedure providing guidance on how concerns can be communicated to the Company. This procedure can be used by employees to report Modern Slavery concerns within the business or the supply chains. The policy applies to all employees and is found within the Employee Handbook, the latest edition being January 2016.

Use of the 'Speak-Out' Confidential Helpline is available to all employees, contractors and agency workers. This is managed by a third party who independently investigate any complaints made. Staff are provided with information at induction with contact details to use and posters and noticeboards around the site provide a constant resource for staff.

Each site has a dedicated Stronger Together noticeboard and information box. This is located in an area where staff pass multiple times per day so that the Stronger Together message is reinforced to them through posters,

and so that they are able to confidentially post information into the box in order to report any complaints or suspicions.

Dunbia encourages and support any individuals who raise genuine concerns with policies in place to ensure that no one suffers any detriment as a result of raising concerns such as disciplinary action, threats of or actual dismissal or any unfavourable treatment.

Our Effectiveness in Combating Slavery and Human Trafficking

Through the measures and policies described in this statement, we have raised awareness for our staff on how to escalate potential slavery internally within the business, and externally through a range of agencies including the Salvation Army, Migrant Help and the Gangmasters Licensing Authority.

Progress during the past 12 months

Dunbia has formed a multi-disciplined Ethical Trade Steering Group to manage its ethical trade responsibilities and has, in the last 12 months:

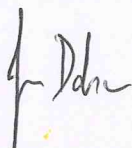
- Devised and implemented an Ethical Trading Policy & Procedure
- Ensured that all labour providers are SEDEX and Stronger Together members with audits either carried out or booked
- Embedded Ethical Trading into induction and activities within the organisation
- Delivered in-house and external ethical awareness training to key internal personnel

We are committed to continuous improvement. Following a review of the steps we have taken this year to ensure no slavery or human trafficking exists in our business or supply chain we intend to take the following further steps to improve our effectiveness:

- Review of recruitment and induction practices and procedures
- Review of transportation practices to and from work
- Translation of relevant policies into most commonly spoken languages other than English
- Ensuring policies are effectively communicated to employees

The board of directors of the Company formally approved this statement at its board meeting on (date)

Signed:



Group Chief Executive

Dated (September) 2016

Next Review due by August 2017