

Policy Statement: Modern Slavery Act

Introduction:

The Silver Spoon Company (SS) supplies a variety of food products such as granulated sugar, desert syrup, milkshake syrup, flour, waffle cones and wafers, under its own brand and for customers' own brand. The products are manufactured either in-house or by third party partners based in the UK and internationally. The raw materials used are sourced from a broad range of suppliers – national and international.

The Silver Spoon Company (SS) nurtures good ethical business practices throughout its supply chain including its internal manufacturing facilities not only by words but by actions. We have an obligation under the Modern Slavery Act 2015, to engage with stakeholders to correct any non-conformances we observe. This is in line with the Policy of Associated British Foods (ABF) which is built on strong ethical foundations.

Our stakeholders include our:

- Employees
- Business partners
- Suppliers of raw materials, goods and services

We ensure that throughout our business that human rights are respected and we are committed to ensuring that our business practices do not cause or contribute to any adverse human rights inputs. This is supported by our commitment to ensure compliance with the UN Universal Declaration of Human Rights.

The Silver Spoon Company also recognises the importance of ensuring that our suppliers have a contractual obligation to respect Human Rights and protect the environment which is set down in our Sourcing with Integrity Policy. This policy document has been updated to address modern slavery and human trafficking specifically. We strive to engage actively with suppliers to ensure there is adherence to our Sourcing with Integrity Policy by taking practical steps, including reviews and on-site visits, to share our policy and clearly explain it.

As part of our due diligence monitoring, we regularly assess the risks within our supply chain based on geography, raw materials and transparency. On-site assessments our suppliers are conducted randomly on an annual basis using technical and ethical standards which include human rights, working conditions and labour standards. We strive to ensure that wherever we operate, that our suppliers and partners comply with local legislation and regulations.

We have documented procedures which protect the human rights of our employees and prohibits poor ethical standards such as forced labour for example. The procedures are shared with our stakeholders and we engage with them to ensure that they adhere to our values and standards. They reflect our commitment to acting ethically and with integrity in

all our business relationships. We will implement and enforce systems to reduce the potential likelihood of Slavery and Human Trafficking occurring anywhere in our business. We engage with our suppliers and partners to agree remedial actions whenever deviation from our policies and procedures is observed.

We strive to ensure that we eliminate the risk of breaching human rights in our business resulting from our products, services and operations. As part of the process we will:

- (i) map our supply chain as much as possible in order to identify the salient human rights risks and take appropriate steps to mitigate the risks
- (ii) monitor adherence to our Policies relating specifically to human rights such as
 - supplier ethical policy and code of conduct
 - Slavery & Human trafficking
 - Health & Safety
 - Environment
 - Anti-bribery & Corruption
 - Gender & Diversity
- (iii) Provide internal staff training on the Policy and the requirements

This Policy Statement is made in pursuant to Section 54 (1) of the Modern Slavery Act 2015. It sets out the approach to be taken to ensure that action is taken timely to eliminate malpractices associated with Slavery and Human trafficking within our business

Signed:



Martin Brewis
Managing Director

Date: 15/9/16

Policy on preventing hidden labour exploitation:

This Policy is in pursuant to Section 54(1) of the Modern Slavery Act 2015. It sets out the approach to be taken to ensure: (i) slavery and human trafficking does not occur within the Silver Spoon Company (SS) business and, (ii) compliance to the Act can be demonstrated through due diligence.

The SS has a proactive approach to tackling labour exploitation (hidden or overt), within the supply chain. Worker treatment including labour and welfare standards, are included in the SS Corporate Social Responsibility Sourcing Policy.

Definitions:

Hidden Labour includes –

- Forced labour
- Human trafficking for labour exploitation
- Payment made for work-finding services
- Work-related exploitation such as forced use of accommodation.

Forced labour involves the deprivation of an individual of their liberty in order to exploit them for commercial gain

Slavery: *examples include*

- Bonded labour
- Forced labour
- Child slavery

Scope:

- Employees: internal manufacturing facilities and central offices
- Business partners
- Suppliers of raw materials, goods and services

Roles &Responsibilities:

The Head of HR has overall responsibility for delivering this Policy

The Head of Technical & Ethical Compliance has responsibility for monitoring Compliance to this Policy

The Head of Procurement has responsibility for ensuring that all suppliers and business partners receive a copy of the Policy and are engaged with the requirements for transparency

The Head of Logistics has responsibility for ensuring that the Policy is shared with suppliers in the storage and distribution supply chain

Support team – put together from across the business has responsibility for reviews

Guiding Principles:

We will strive to build a strong relationship with our suppliers and employees to eliminate poor ethical practices such as Slavery, & human trafficking if observed within our business

Our public declaration statement will be approved by the SS Board, signed by the Managing Director and communicated to all stakeholders annually.

Recruitment:

Applicants will not be charged a fee for finding work within the supply chain. There shall be procedures in place for verifying the supply chain to ensure that eg. employment agents used to source and supply workers are not charging applicant a work finding fee

Only approved employment Agencies will be used. They shall be monitored at least once per quarter to ensure that they have Policies and Procedures in place for demonstrating Compliance

Only employment agencies approved by the Gangmasters Licensing Authority shall be used

All staff responsible for directly recruiting workers shall be trained to be aware of issues around labour exploitation and signs to look for

The approach taken to tackling hidden labour exploitation within the supply chain shall be communicated to the workforce through the employee handbook for example and, periodic floor briefings

All job applicants will be interviewed in an approved location

Applicants must complete documents personally.

Job application documents must not be completed on behalf of others

There will be no occasion when money is paid to be introduced to the Company

Agency/temporary workers must not be forced to work against their will

Bullying, discrimination, physical or harsh treatment is not allowed

Employees:

All employees shall be encouraged to report cases of hidden labour exploitation within the supply chain.

All members of staff are valued, treated with respect and dignity and encouraged to raise issues without fear of retribution

There shall be no discrimination in any circumstance within the business and this is in line with commitment gender and diversity by SS

Suppliers & Partners:

All Suppliers and Partners shall receive a copy of our Code of Conduct for Ethical Sourcing in addition to the business Contract, which sets our standards relating to Labour & welfare, business ethics, anti-slavery and human trafficking

We will undertake planned audits of the supply chain to ensure this Policy is adhered to.

Approach:

The approach taken to identify and prevent hidden labour exploitation within the SS supply chain is as outlined below.

- There is a documented CSR Policy incorporating “modern slavery, bribery and corruption”, which is communicated to all suppliers including labour providers and reviewed regularly which details the standard required to ensure that forced labour and labour trafficking are not used.
- Should poor labour practices be identified, we will engage with the supplier to achieve improvement and implement corrective actions. Suppliers who fail to comply shall be de-listed and not approved to supply.
- There shall be a Board member designated to have responsibility for the welfare and labour standards including ethical trade and explicit responsibility for preventing modern slavery and corporate social responsibilities for the SSC.
- Where and when appropriate, we will work proactively and collaboratively with enforcement authorities including the police and GLA to assist in crime prevention and prosecution
- There shall be procedures in place and communicated for managing any incident of mistreatment, coercion, bullying or harassment. If non-conformance is identified, it shall be investigated as a gross misconduct offence
- All suppliers shall be required to subscribe to Sedex and ensure their information is provided in the on-line SAQ or at the very least complete our internal ethical self-assessment questionnaire. They shall be monitored regularly to check that no issues relating to trafficking or worker exploitation has been highlighted in ethical audits. Where issues have been identified, there must be record to demonstrate that they have been formally investigated and resolved.

Due diligence monitoring process: examples of activities constituting slavery and human trafficking are as follows

Forced labour examples:

A migrant worker is a person who is engaged or to be engaged in a remunerated activity in a state of which he or she is not a national

State sponsored or controlled – eg. forced prison labour or the mobilisation of children, public employees etc for crop harvest

Employer controlled – eg.

- (i) Knowingly holding workers in forced labour situation
- (ii) Harsh conditions eg. debt bondage; retention of wages, excessive hours; penalties
- (iii) Outsourcing of work to illegal or uncontrolled sub-contractors at wages which exploits the workers
- (iv) Engage workers through a labour supplier at a wage which can only be achieved through worker exploitation

Employment/recruitment agents – eg.

- (i) Supply of labour who is required to pay recruitment fees, or is in debt bondage or retention of wages which have the effect of holding workers in a forced labour situation. (ILO Convention 181 Article 7(1) states that private employment agencies shall not charge directly or indirectly, in whole or in part, any fees or costs to workers or jobseekers).
- (ii) End user employer – complicit, negligent, naïve or genuinely duped by convincing and manipulative labour providers

Gangmaster/Exploiter controlled – eg

- (i) Organised criminal gangs and exploitative individual who recruit workers and force them to work for legitimate employers without disclosing that the workers are being controlled
- (ii) Rogue supervisors, consultants and workers controlling workers within a descent and responsible business environment