



Modern Slavery and Human Trafficking Statement

Introduction

Walkers Shortbread Limited ("the Company") is committed to preventing slavery and human trafficking in its corporate activities and to ensuring its supply chains are free from slavery and human trafficking.

Scope of Statement

This statement covers the activities of the Company including two production and 5 retail sites and all goods or services bought by the Company.

The Company currently operates both retail and production facilities within the United Kingdom.

Responsibility for the Company's anti-slavery initiatives is as follows:-

- Modern Slavery and Human Trafficking Statement update: The Board of Directors are responsible for ensuring the statement is up to date and accurately reflects the Company's actions and initiatives to tackle slavery and human trafficking;
- Policies: The HR, Management Teams and Directors are responsible for introducing policies and reviewing the process by which they are developed;

Relevant Policies

The Company operates the following policy that describes its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Ethical Trading Initiative: The Company's ETI demonstrates the Company's commitment to being fair and just in dealings, contracts, and agreements with employees, agency workers, contracted workers, suppliers and customers.

Due Diligence

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

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping, supplier approval and monitoring procedure;
- Using Sedex, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular. Suppliers are requested to be on Sedex and provide a link to their Ethical SAQ;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

The Company is audited by Intertek on an annual basis to ensure ethical compliance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2016.

Board Approval

This statement has been approved by the Company's board of directors and signed by the Managing Directors, who will ensure it is reviewed and updated annually.

Signed Joseph Walker
Signed James M Walker

Date 7.3.17

Date 11/3/17