



Modern Slavery Act Statement

Introduction

This statement sets out the steps taken by Dr. Oetker (UK) Ltd (“Company”) to understand and address all potential Modern Slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no Slavery or Human Trafficking in its own business and its supply chains.

As part of the FMCG industry, the organisation recognises that it has a responsibility to take a robust approach to Slavery and Human Trafficking.

The Company is absolutely committed to preventing Slavery and Human Trafficking in its corporate activities, and to ensuring that its supply chains are free from Slavery and Human Trafficking.

Organisational Structure

This statement covers all activities of the Company, which is part of the Oetker Group, one of the largest European family-owned companies.

The Company is a frozen and ambient food manufacturer employing around 550 people across its two sites in Leeds and Leyland.

Supply Chains

An independent third party has analysed the supply chain for all key products into Dr Oetker. The areas where the higher risk within the supply chain was identified, a number of key suppliers within the category were asked to complete a report detailing their sustainability best practices. These practices (and their results) are currently being reviewed and the next steps determined.

An additional section requesting a comment on their Modern Slavery statements has been added for any new raw material and packaging supplier.

Responsibility and Due Diligence

Overall responsibility for the organisations anti-slavery initiatives lies with the Managing Directors. The Executive Head of Human Resources is responsible for the creation of this Statement and for ensuring that training of internal staff is carried out.

Training

In order to ensure that key staff understand and are aware of the risks of Modern Slavery and Human Trafficking, both in our business and our supply chain, training has been delivered to our HR Team, Purchasing Team, Supply Chain and Production Team. This will continue to be a focus at the Company throughout 2018 with our Executive Management Team and wider Operations Team receiving training on the risks of Modern Slavery and Human Trafficking.

Policies

The Company recognises that the supply chain of food production and processing is one of the sectors which may be at risk of Modern Slavery. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner, these policies include:



- **Employee Code of Conduct;** which describes the standards of conduct and ethical behaviour that the Company expects its employees to adhere to.
- **Supplier Code of Conduct;** which applies to all suppliers of the Company requiring strict compliance with the law and compliance with the core ILO labour standards.
- **Corporate Social Responsibility;** has the objective of ensuring that the Company manages its operations in a socially and environmentally responsible manner.

In 2018 the Company will introduce the following policies that reflect our commitment to acting with integrity and to combating Modern Slavery.

- **Whistleblowing** Dr. Oetker (UK) Ltd is committed to developing and adopting a proactive approach to enable staff, contractors and visitors, who become aware of wrongdoing, illegality or unethical conduct within Dr. Oetker and its supply chains, to report their concerns at the earliest opportunity so that they can be properly investigated and addressed. The confidentiality and anonymity of individuals who report suspected wrongdoing under this Policy will be maintained as far as reasonably practicable, and staff will not face reprisals for disclosing concerns even if they turn out to be mistaken.
- **Recruiter Compliance** The Human Resources Team of Dr. Oetker (UK) Ltd have all read, understood and signed the Recruiter Compliance document which requires all recruiters to act with integrity.

Communication

The Company is committed to raising awareness of the issues surrounding Modern Slavery and Human Trafficking and has taken steps to ensure that posters are displayed prominently on all notice boards. In addition, in 2017 the subject of Modern Slavery was added to the Company induction, which ensures that all new starters to the business are made aware of this important subject and their responsibilities.

Audits

Dr. Oetker (UK) Ltd understands that exposure to Modern Slavery could be present within the use of its temporary labour. As part of our supplier audit process, the Company audits its temporary labour suppliers on an annual basis to ensure compliance with Modern Slavery laws and has committed to auditing its temporary labour on a quarterly basis to monitor further the risks of Modern Slavery.

This statement covers financial year 1st January 2017 to 31st December 2017 and has been approved by our Managing Director.

Dr. Johannes Rosenthal

Managing Director