

## **Burton's Biscuit Company (a trading name of Burtons Foods Limited) ("Burton's") – Slavery and Human Trafficking Statement for the Financial Year 2016**

This statement is made pursuant 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.

We employ over 2,000 people around the UK, in three main manufacturing facilities in Llantarnam, Edinburgh and Blackpool, a chocolate refinery in Moreton and a central distribution hub in Liverpool. Our head office is based in St. Albans and a subsidiary office is located in Blackpool. We also engage temporary labour at sites, via labour agencies and we outsource certain services to third party providers.

Burton's take its responsibility for the lives of those employed by it and the environment in which it operates seriously. With this in mind, Burton's Biscuit Company commits to ensuring it complies with the Human Rights Act, and pays due regard to environmental impacts and ethical business practices. As a company, we use the standard of the ETI code (the Ethical Trading Initiative code) as our minimum standard.

Burton's Biscuit Company forbids the use of child labour and our Social Compliance Policy states clearly that no person shall be employed at any age younger than the legal minimum age for working in the jurisdiction in which the work is being conducted. Where certain workplace conditions apply such as night shift work, working with dangerous machinery and/or hazardous substances, no person under the age of 18 will be employed.

New joiners as part of their induction are introduced to the ETI code and the standards contained within it which include the following:

- Employment is freely chosen;
- Child labour shall not be used;
- Living wages are paid;
- Working hours are not excessive; and
- No discrimination is practised.

Our HR team carry out regular self-assessment audits for each site, to make certain the code is followed and checks are undertaken of employee's addresses to highlight any instances where there are multiple employees at the same address that require investigating. Any concerns are then addressed with appropriate steps taken to resolve the issue. Also at site level where we employ agency staff, we use only licenced and approved agencies that are contractually bound to comply with applicable legislation and standards. These agencies are subject to audits to ensure they meet BRC global standards (a manufacturing certification programme) and retailer codes of practice.

Burton's also has a clear Business Protection and Whistle-blower policy as well as a Business Protection Helpline where employees are encouraged to report any concerns regarding internal practices. Burton's factory sites are also subject to independent audits at a frequency based on risk.

As a biscuit manufacturer, we have a large number of suppliers of ingredients, packaging and services. To ensure best practice throughout our supply chain, we have a comprehensive supplier and material approval review procedure. All suppliers go through this process and we include an

ethical questionnaire as part of our initial assessment, of all supply sites. Our trading terms also require suppliers to perform services in accordance with ethical trading initiatives and industry standards.

Burton's is a member of Sedex (the Supplier Ethical Data Exchange), a not-for-profit membership organisation dedicated to driving improvements in responsible social and ethical business practices in global supply chains. Sedex works as a collaborative platform for sharing ethical supply chain data and enables members to share and report on information in key areas such as labour standards and business ethics. As members of Sedex, we actively monitor the ethical standards to which we, and our suppliers, adhere to and it is the preferred method for ongoing assessment of our supply base. Approximately 95% of our supply base is Sedex registered, with remaining suppliers asked to complete an ethical questionnaire annually. Burton's supplier audits include ethical standards, at a frequency based on risk, and we also audit the information our suppliers have on Sedex. Where a supplier shows any high risk score, this will trigger an audit and appropriate steps will then be taken to address the issue.

Burton's has long recognised the benefits of using ethically and sustainably sourced raw materials. Wherever possible, we actively look to source locally produced ingredients for our products. This not only helps support the local economies in which we operate, but also gives us additional reassurance over the provenance and quality of our ingredients. Burton's purchases all of its bulk palm oil from sustainable, segregated sources. We have supported the drive towards palm oil sustainability since 2006, when we became a member of the Roundtable on Sustainable Palm Oil (RSPO) and we were also one of the first companies to purchase the initial RSPO certified segregated palm oil in the UK.

We also only source cocoa based products from suppliers that are members of the ICI (International Cocoa Initiative) or the WCF (World Cocoa Foundation). The ICI supports schemes and organisations that are working to eradicate child labour in the cocoa sector and the WCF funds work to ensure the sustainability of the cocoa industry through programmes such as The Sustainable Tree Corps Program and also helps improve the livelihood of cocoa farmers.

The Board carries out a strategic risk assessment of the company quarterly and looks at processes in place and actions required to reduce all strategic risks where economically possible. The Sedex system allows us to monitor and be alerted to any high risk areas and together with our own due diligence processes we are prepared to address any issues if and when they arise and take the appropriate steps. We pay particular attention on both the manufacturing workforce and the supply chain as these are the highest risk areas in the business.

Burton's is committed to ensuring that incidences of child labour, labour exploitation, modern slavery and human trafficking do not form part of our business and supply chain. We are confident that the policies and procedures we have in place and the standard we require of our suppliers will allow us to attain this goal.

Signed by NICK FIELD, CEO



5 December 2016