



PRODUCT OF SCOTLAND  
**Walkers**  
-- ESTABLISHED 1898 --



## 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 all 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 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 Policy: The Company's ETP demonstrates the Company's commitment to being fair and just in dealings, contracts, and agreements with employees, agency workers, contracted workers, suppliers and customers.
- Child Labour & Young Persons policy which defines our standard required from all aspects of the supply chain.

### 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 and 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 relevant policies, including the termination of the business relationship.

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

### Board Approval

This Company's Board of Directors has approved and signed this statement and will ensure it is reviewed and updated annually.

Signed James N Walker

Date 26/7/19

Signed [Signature]

Date 26/7/19