

# The Compleat FOOD GROUP



## The CompleAT Food Group: Modern Slavery and Human Trafficking Statement

Financial Year April 2018 to April 2019

This statement is in response to the Modern Slavery Act 2015, and sets out the Company commitment to identifying and preventing modern slavery and human trafficking in any part of its business and supply chain.

The CompleAT Food Group is a fast-growing food business that supplies own-label and branded chilled, frozen or ambient foods to the major supermarket chains in the UK, in addition to Food Service and food manufacturers. They source food products from a wide number of manufacturing facilities based throughout Europe.

The CompleAT Food Group refers to:

- Winterbotham Darby & Co Ltd. (Distribution warehouse and Offices), Redhill, Surrey.
- Deli Solutions Ltd. (Manufacturing Facility), Clitheroe, Lancashire.
- Alatoni Ltd. (Manufacturing Facility), Bicester, Oxfordshire.

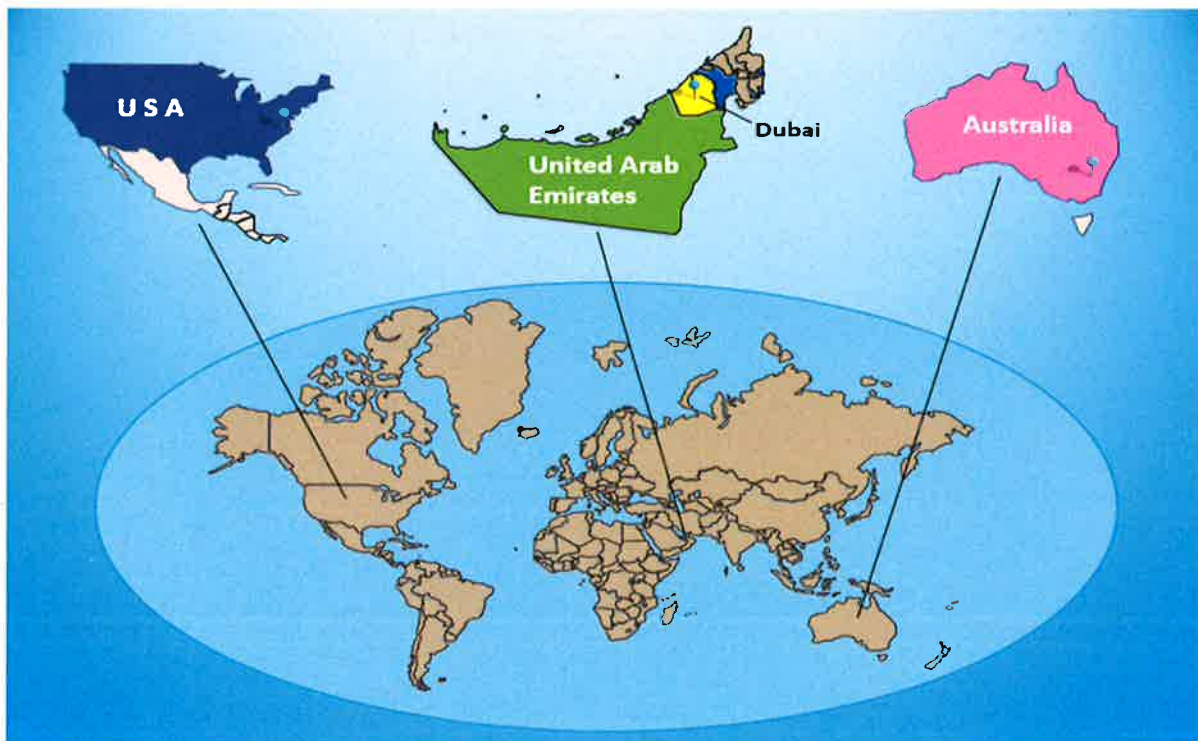
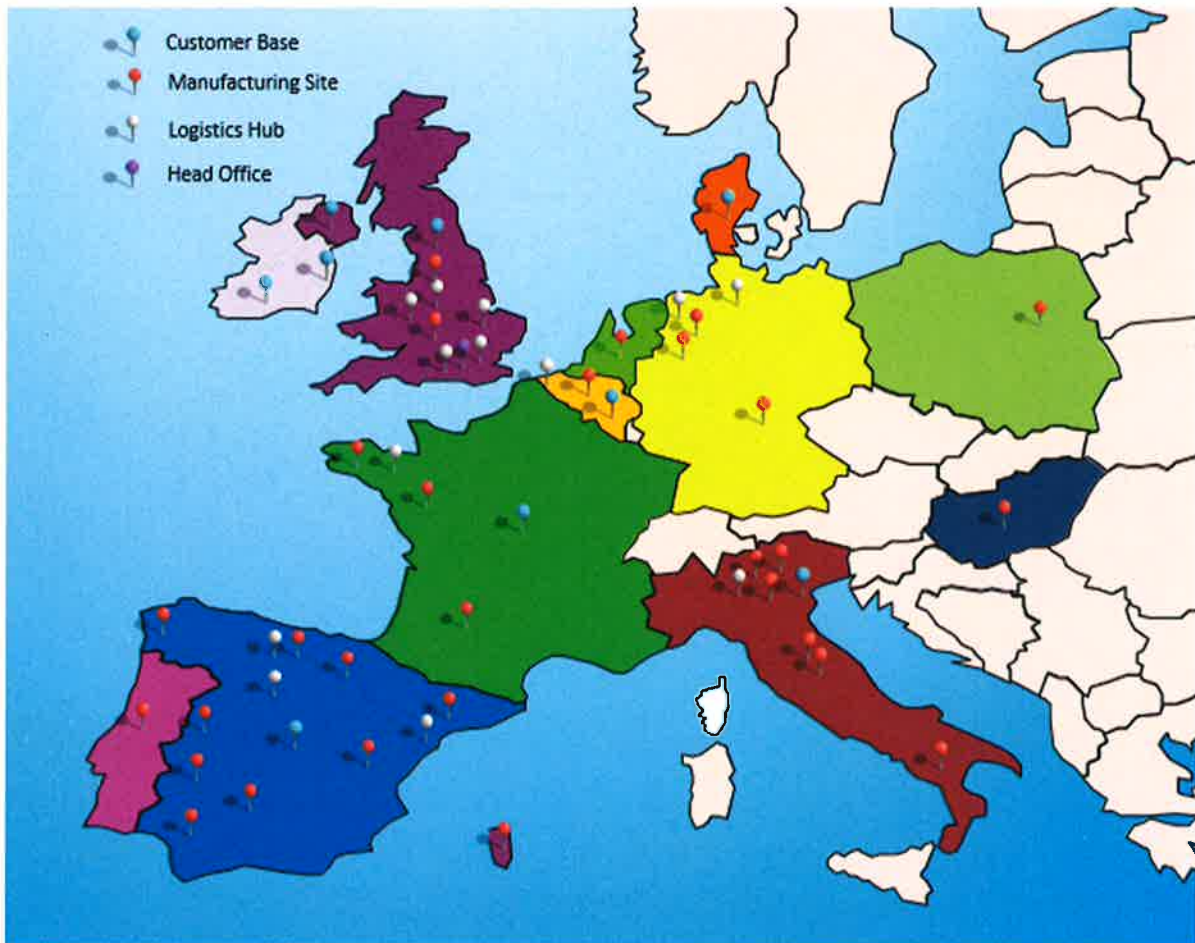
The Company commits to developing and adopting a proactive approach to tackling modern slavery and human trafficking within its UK business practices, as well as through risk assessment and due diligence of its supply base throughout Europe.

### The supply chain

Winterbotham Darby & Co Ltd. is a UK based warehouse and head office with functions including: procurement, technical, product development, commercial and finance. This company is a supplier of continental products typically produced in manufacturing sites across Europe. The supply base is complex with primary sites being based throughout Europe who procure raw materials from a worldwide supply base. The company uses mapping to give transparency of its supply chains and to understand the human rights risks.

Deli Solutions Ltd. and Alatoni Ltd. are both manufacturing sites of olives, anti-pasti and other added value vegetable based products. These sites import raw materials from a worldwide supply base for further processing within their UK based manufacturing facility.

**The COMPLEAT Food Group Supply Chain Overview Map**



### **Steps to prevent modern slavery and human trafficking**

The Company has a Modern Slavery and Human Trafficking policy which sets out the responsibilities, commitments and the procedure to be followed in the event that a case of Modern Slavery or Human Trafficking is suspected.

Risk assessment is regularly undertaken, in line with company policy and with support of external stakeholders, to identify potential risk of modern slavery and human trafficking.

The following protocol is followed to identify and prevent modern slavery and human trafficking in the supply chain:

1. All primary manufacturing partners undergo ongoing risk assessment and auditing of their manufacturing practices, in line with Company policy.
2. Confidential reporting structures for the reporting of modern slavery and human trafficking within the businesses are in place.
3. Where cases of modern slavery and human trafficking are suspected investigations are carried out with the manufacturing facility, and appropriate local authorities.
4. Commencement of supply is reviewed from any aspects of their supply chain where modern slavery and human trafficking is discovered or suspected.
5. Where modern slavery and human trafficking is discovered or suspected the decision to re-commence supply with a manufacturing facility will be based on findings of the investigation, and will be risk assessed by the Company, and where relevant the customer
6. All cases of identified modern slavery and human trafficking will be reported:
  - a. According to country specific local law
  - b. Where appropriate, the customer of the final products affected

In addition the company has developed a Human Rights policy. This policy is in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

### **Implementation within the UK**

A multifunctional team was formed in order to embed the fundamental principles of identifying and removing any forms of modern day slavery or human trafficking from within our UK facilities. The team, which includes stakeholders from different departments, has thoroughly analysed the provision and flow of workers within our business and identified areas where they may be vulnerable. By engaging people from different departments, it has helped us devise policies and procedures best suited to business operations. This ensures they are both relevant, functional and therefore implemented correctly and in full. The team has a monthly meeting to keep up to date on Ethical issues.

The Modern Day Slavery team has created a business recruitment policy, which details how recruitment shall be performed, the procedure for interview, those staff who should be involved in the recruitment process and details of the written job contract.

Recruiter compliance principles are completed by all employees involved in recruitment. Every month randomly selected workers are required to complete questionnaire on their employment, confidentially, offering them the means to alert the business to any concerns they may have.

The number of labour providers used at sites has been rationalised to give focus. A centralised template for auditing labour providers has been developed which includes face to face interviews with agency workers. Labour providers are audited annually at least.

The company are engaging with the UK labour providers to join the RRT (Responsible Recruitment Tool) scheme.

The company are members of the Association of Labour Providers (ALP), which provides information and support to all the UK sites.

The company is currently updating its Modern Slavery processes against the Stronger Together Forced Labour Checklist.

The company are exploring further down their indirect supply chains to identify vulnerable areas where exploitation could be occurring. Two areas of risk have been identified to focus on:

- Waste and Recycling
- Transport and Logistics

To assist understanding of the risks in these areas and to achieve engagement from organisations within these industries the company are members of the IPHR Forum and FNET working groups focusing on these areas.

### **Training**

The Company are members of the ALP. This resource offers access to specialist training and events which members of the HR and technical functions have attended, for example a workshop on responsible recruitment.

Liaising closely with agency labour providers, to encourage their engagement also in such workshops and training events to build on their knowledge and understanding of modern day slavery.

The company induction now includes a section on what is Modern Day Slavery, how to spot the signs, and what to do if you are or suspect someone is a victim of modern slavery.

The company are partners of Stronger Together and in 2019, members of the team have attended the following courses:

- Tackling Modern Slavery in UK Businesses
- Handling Suspected Cases of Forced Labour in the UK
- Tackling Modern Slavery Through Purchasing Practices

In 2019/2020, they aim to further develop understanding of modern slavery at our UK sites by arranging training by an external specialist for all key personnel.

The company will be arranging specific training with FNET for members of the Technical team who visit farms, growers and manufacturing sites to be able to identify potential human rights risks.

### **European Manufacturing**

Over the past 12 months efforts have been focused on the engagement of the manufacturing base in the issues surrounding modern day slavery and human trafficking.

All suppliers are required to comply to the company's Ethical Policy.

To obtain an understanding of the ethical status of new sites before supply commences there is an Ethical section within the New Supplier Questionnaire. This gives initial information which will then be followed by membership of Sedex or Completion of a SAQ depending on the supplier/customer.

Sedex (Supplier ethical data exchange) is a useful tool to the business helping to identify and mitigate risk within supply chains. Sedex provides an initial risk assessment for a supplier taking into consideration known inherent country and industry risks. This allows identification and monitoring of specific high risk products or areas.

The Company requires all sites that supply UK retailer own brand products to be members of Sedex. Sites must be fully linked to WBD, with fully visibility rights of their SAQ and audit information. Sites must have a fully completed SAQ to be reviewed every 6 months. This is also now a requirement for many of our Food Service customers.

For production partners that supply branded lines and ingredients they are also required to join the Sedex network, or they complete the WBD Ethical SAQ. 41% of branded sites have joined Sedex.

The company works with a select group of small artisan businesses based in the UK. These business supply products for the company's branded Deli Counter. For these small scale operations, the WbD Ethical SAQ is completed annually.

### **Primary Agriculture and Processing**

Further down our supply base, we recognise the need for further education on the fundamentals of modern day slavery and human trafficking. Our supply base consists of hundreds of small growers and farmers and reaching out to these producers using appropriate communication methods and materials remains a constant challenge. Where applicable we encourage growers to undertake Global GRASP certification, or alternatively join Sedex. Regardless, all growers and livestock farmers are required to complete WbD SAQs to provide the business with improved understanding of the ethical practices within these supply chains. We are proud to recently have become members of the Spanish Ethical Forum, which will allow our Spanish suppliers of olives a network with other produce suppliers to discuss the challenges faced by the industry and collaboratively drive on implementing best practice.

## **Risk Assessment**

The scope of the ethical site risk assessment has expanded risk down the supply chains is explored. The risk assessment is being updated to incorporate the Tackling Modern Slavery Through Purchasing Practices Toolkit and this will be completed in by December 2019.

By undertaking this risk assessment key risk areas have been identified across the business and supply chain. The agricultural supply chain is a complex one and has been highlighted as posing a risk to human rights violations. This is because of the seasonality, short harvest window and harvesting methods employed often in some of our supply chains in Italy, Morocco and Turkey. We therefore continue to work with our suppliers to gather information to understand the potential human rights issues.

## **Audits**

The company work with a team of global independent auditors to conduct ethical audits. Local auditors who are familiar to the laws, working practices and language of the country where the audit is taking place are used. Audits consist of observations from a site tour, paperwork reviews, confidential employee interviews and management interviews.

In the financial year 2018/2019 ethical audits were carried out at 12 manufacturing sites.

This year there have been a number of new small manufacturing sites which would not be suitable for a SMETA Ethical audit and therefore the company have developed an audit format with Impactt which is suitable for this type of site.

If a non-conformance is identified, the company aim to work together with sites and certification bodies to implement sustainable solutions to resolve these issues.

The company have joined the Sedex SMETA 7.0 working group to be involved in the development of the new audit standard which are sites will be assessed against.

Audit non-conformances are trended to highlight common areas, which require focus. Best practice guides have been written on key areas and communicated to sites, encouraging business to internally review their procedures against these suggestions, with the aim of driving sustainable change.

The scale, complexity and seasonality of our supply base of primary growers and farmers, means that specific independent audits are not always possible. Therefore additional ethical compliance questions have been incorporated into the standard WBD visit template, so this data can be captured whenever a site visit is undertaken.

## **Collaboration**

The Company acknowledges that the most powerful means of driving sustainable change within global food supply chains is through collaboration and the collective leverage of the food industry as a whole.

The Company including the UK manufacturing sites are business partners of Stronger Together, a multi stakeholder initiative aiming to reduce modern slavery, particularly hidden forced labour, labour trafficking and other third party exploitation of workers. As business partners we provide evidence to publicly demonstrate the business's commitment to tackling hidden labour exploitation.

The Company is a member The Food Network for Ethical Trade (FNET) which has been established to improve human rights in global food supply chains through a common approach to managing ethical trade. It aims to support suppliers to identify, manage and respond to global food supply chain ethical trade risks, to improve the food industry's understanding of ethical trade, to identify and facilitate collaboration opportunities, to promote trust and build a forum for sharing issues and challenges and, in the longer-term, to support the food industry to focus on promoting human rights in global food supply chains.

The company is a member of the Sedex Stakeholder Forum (SSF), which brings together manufacturers, brands, retailers, NGO's, auditing bodies and industry experts to discuss challenges in ethical trade and responsible sourcing and solve these problems collaboratively.

As member of FNET, IPHR Forum and Spanish Ethical Forum the company is able to collaborate and gain understanding of this risks in the supply chain.

In addition to the above, the Company are actively engaged with our retail customer Ethical teams. Supporting best practice groups and guidance workshops.

The company are members of Association of Labour Providers (ALP) which provides information and support for all the UK sites.

Throughout 2019/2020 we envisage continued active involvement in such collaborative working.

## **Achievement of Objectives**

In order to assess the effectiveness of the Company's work to tackle modern day slavery within the supply base the following KPIs are routinely monitored:

- Number and nature of concerns reported on the Health Assured Whistleblowing hotline
- SAQ completion
- Review of ethical audit non conformances
- Completion of ethical audits to customer requirements
- Upload of ethical audits onto Sedex
- Completion of ethical audit non-conformances within agreed deadline

Ethical is reviewed during quarterly Technical Performance Updates and UK Site Update meetings. In addition, key KPIs are included in the monthly Executive meetings.

### Ethical Objectives 2019/2020 Overview

- Update the ethical risk assessment against Stronger Together 'Tackling Modern Slavery Through Purchasing Practices Toolkit'
- Update the Modern Slavery processes against Stronger Together 'Forced Labour Checklist'
- Warehouse and Transport suppliers to engage on human rights risks through FNET working group
- Recycling and waste suppliers to engage on human right risks through IPHR Forum working group
- UK labour providers to join Responsible Recruitment Tool Kit
- Implementation of GRASP for strategic growers
- Engage our Spanish Growers on Human Rights risks through membership of the Spanish Ethical Forum and Stronger Together Spanish Project
- Raise awareness of Modern Slavery across all 3 UK sites by arranging training with an external specialist for all key personnel.
- Improve Worker Representation across UK sites through involvement of FNET working group
- Development of an Ethical checklist to be used by the Technical team when visiting manufacturing sites, growers and farms. Training to be provided on the checklist by FNET

Signed:



Steven Higginson

CEO

Date: 05/11/2019,