



MSA Statement

WESTMILL - MODERN SLAVERY ACT STATEMENT

Westmill published their first Modern Slavery Statement in 2016. Year on year we are increasing our work on Modern Slavery, deepening our understanding of risk and adapting our internal policies and procedures to effectively manage identified risks. Global Modern Slavery is considered an ever increasing concern, we share this concern and are committed to doing everything we can to make sure that slavery does not manifest in our complex supply chains.

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015: “slavery, servitude and forced or compulsory labour”. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Westmill’s third slavery and human trafficking statement for the financial year commencing September 2018 and ending September 2019

ORGANISATIONAL STRUCTURE

Westmill is a UK based business with operations across four UK manufacturing sites and one sales office based in the Netherlands. We are one of Europe’s largest specialist food companies, manufacturing and distributing mostly Asian foods and goods into the Asian diaspora wholesale sector, restaurants and takeaways as well as the UK Retail Sector, Food Service and Business to Business channels. Westmill is wholly owned by Associated British Foods plc.

Westmill sources both raw materials and finished goods from around the world and works with a diverse portfolio of suppliers. We also have a number of license agreements with other food manufacturers for the distribution of their branded products into the UK and other European markets.

We permanently employ approximately 370 people in the UK and under 10 in mainland Europe. We also engage temporary labour at sites, both directly and via labour agencies, to cover changes in seasonal demand for products. We outsource other services, such as distribution, cleanin security to third party providers.

POLICIES AND GOVERNANCE

As set out in our previous statements, we are committed to creating an environment and culture where employees feel that they can give of their best in helping to build a great business. We have a range of policies and procedures in place that provide direction on what employees can expect from the business and what the business expects from them. Our commitments on ethical trade, human rights and modern slavery are set out in a number of policies which guides our relationships with suppliers and partners and our purchase of products and services.

Policies

- **People Policies:** our Resourcing and Employment Policy sets out our employment principles, whilst our policy on Preventing Hidden Labour Exploitation specifies the measures we take to limit the possibility that hidden worker exploitation could take place at any of our sites.
- **Human Rights:** sets out our approach to the protection of fundamental rights of workers throughout our supply chains.
- **Supplier Code of Conduct:** sets out the social and environmental standards that we expect of all our suppliers. Suppliers (supplying raw and packaging materials as well as finished and licensed products) are requested to sign to accept our Westmill Supplier Code of Conduct which explicitly refers to the ETI base code and ILO convention. It contains reference to our business policies in relation to slavery and human trafficking.
- **Ethical Trading:** sets out the steps we expect suppliers to take when doing business with Westmill, including adherence to our Supplier Code of Conduct. We take the approach of working with suppliers who demonstrate a willingness to improve; however if cooperation is not being made we will responsibly exit the supplier.
- **Agency Labour Policy:** sets our minimum standards for agency labour providers, such as taking proactive steps to address hidden labour exploitation. We acknowledge that one of our key risk areas is our usage of temporary labour so have worked with our licensed labour providers so that they understand these expectations. We actively audit our agencies who supply us with temporary labour against legislative compliance. This includes both ensuring the temporary labour they supply is eligible to work in the UK and compliance with the Modern Slavery Act.

We make sure that all of our recruitment and outsourcing partners are aware of, and agree to, the principles of our policy and we expect them to communicate to us the steps they take in their own organisations to prevent hidden labour exploitation. We also require our providers to sign-up to our Supplier Code of Conduct (which is based upon the ABF Supplier Code of Conduct) and provide us with copies of their ethical policies.

Governance: we have a robust governance structure which oversees the development and implementation of these policies across our business. All policies are reviewed annually to reflect any changes. Changes are fed into the relevant steering committees for approval and overall accountability resides with our Managing Director.

Reporting: we have a robust process for reporting slavery and human trafficking through our confidential whistleblowing hotline which is an established and trusted channel for employees to report issues in our business.

RISK MANAGEMENT

The signs of Modern Slavery are complex, hidden and multiple. To prioritise activity we have a robust approach to identifying and assessing risks and defined scope of activities. The inputs of our risk assessment include detailed mapping of supply chains, ethical audit results, supplier engagement, desk-based research and supplier relationship information. Inputs into the risk assessment include detailed mapping of supply chains and operations, desk based research on product industry and country, supplier surveys, supplier engagement and discussions with expert stakeholders. Our approach and focus varies depending on the level of assessed risk for each supply chain as well as our ability to influence change.

We have a good oversight of our direct suppliers' operations, built from supplier visits in combination with ethical audits and Sedex (or equivalent electronic ethical data sharing platform) SAQ results. In 2017/18 our parent company hired specific in-country resource in Turkey in response to the increasing risks of Modern Slavery in the region. We constantly horizon scan to understand the changing landscape of risk from a country and industry perspective. Where there is an identified risk of slavery or human trafficking (either in country or in the Industry sector as a whole) we will undertake appropriate remediation steps. This will be addressed on a case by case basis and the Business will seek expert advice where appropriate to address any identified issues. We continue to work to improve transparency beyond our direct supplier operations through comprehensive supply chain maps in collaboration with all suppliers in scope.

EFFECTIVENESS AND PERFORMANCE INDICATORS

Our approach to Ethical Trade includes our focus on tackling modern slavery. We have established Key Performance Indicators (KPIs) to demonstrate the progress made here such as: social auditing, improving supply chain transparency and supplier training. The effectiveness of the processes established to limit the possibility that slavery and human trafficking could take place is also measured against KPIs as appropriate.

DUE DILIGENCE

Having established risk and prioritisation we must conduct due diligence to understand if there is any evidence of Modern Slavery. We have a robust ethical auditing programme (conducted by trusted 3rd party auditing firms) which assesses suppliers against the SMETA audit protocol on behalf of Westmill. If issues are identified - in the form of Non Conformances - appropriate remedial actions are taken including corrective action plans.

Unfortunately, ethical audits do not always identify complex and hidden issues such as Modern Slavery which is why undertake 2nd party assessments and endeavour to develop strong supplier partnerships with suppliers we know and trust. We are working to understand how we can expand this even further in the future.

We also find it hard to influence due diligence further down the supply chain where we do not have direct influence or control; we are committed to continue working on our approach to overcome this.

In 2017 we also updated our supplier approval process to include supply chain mapping and completion of Sedex SAQ so that our procurement and technical teams are having meaningful ethical conversations with suppliers up front before developing purchasing relationships with them.

Internally, all of our UK Manufacturing Sites have been independently ethically audited against the SMETA audit criteria and we ensure that these audits are conducted every 3 years

TRAINING CAPACITY

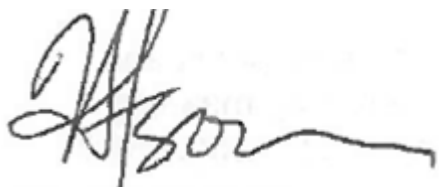
We recognise that our suppliers and workforce have a significant role to play in tackling modern slavery. We continue to work to ensure that they are equipped with the right knowledge and skills to do so

- **For Senior Management, Procurement & relevant Technical Colleagues:** received Ethical Awareness Training and specific training on the objectives of the Modern Slavery Act and the prevention of slavery and human trafficking in supply chains. Our Procurement team have been further trained on the ETI base code, Sedex, and the social auditing process as well as our Sustainability Lead trained in the SA 8000 training course. In 2017/18 the team were also trained on spotting the signs of forced labour when visiting suppliers and our Sustainability Lead underwent the ETI's Human Rights training course.
- **For Line Managers & Colleagues in Recruiting Positions:** over 90% have now completed the Stronger2gether e-learning training.
- **For All Other Colleagues:** in 2016/17 we adopted some of the key elements of the 'Stronger Together' programme across our sites as part of our employee induction programme. We also ran internal poster campaigns and presentations at team briefings to raise awareness. More broadly, since 2016/17 we have organised internal sustainability sessions across all business functions, covering a range of topics including ethical risk and modern slavery.
- **For Agency Labour & Cleaning Providers:** in 2017/18 our providers rolled out Stronger2gether training to relevant staff members.
- **For Suppliers:** in 2017/18 we developed our own internal Modern Slavery Awareness pack which we have begun disseminating to the suppliers where we have identified potential risk.

Ethical training materials and particularly MSA aspects are included in induction training sessions and are available through the company intranet for ongoing guidance as required. We are a member of our parent companies working group on Corporate Responsibility where Modern Slavery is discussed and cross-business approaches reviewed to share knowledge and expertise on risk assessment, training and managing issues.

STATEMENT REVIEW

This statement will be reviewed and updated annually and published on our website.



(<https://westmill.co.uk/wp-content/uploads/2018/10/nh-sig.gif>)

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