

MODERN SLAVERY STATEMENT

Introduction

"Modern slavery" is a term which covers slavery, servitude, forced and compulsory labour and human trafficking. It includes exercising ownership over a person; coercing or threatening someone to perform work they would not do voluntarily; and arranging or facilitating another person's travel with a view to them being exploited (even where the person consents to the travel).

Whitworth Bros Ltd aims to ensure that there is no modern slavery within its business or supply chains. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.

This statement covers our financial year ending 31 March 2017.

Overview

Whitworth Bros Ltd is one of the UK's largest flour millers operating from 5 main locations, namely Wellingborough, Northamptonshire; Dogsthorpe, Peterborough; Worksop, Nottinghamshire; Whitley Bridge, North Yorkshire and Holbeach, Lincolnshire. The mill at Wellingborough is the oldest, dating back to 1886. Whitworth Bros Ltd employs around 370 employees across the UK.

We produce bulk and bagged speciality flours, as well as maize and rice products for our customers who vary from large industrial food manufacturers, large and small retailers through to small local bakers. Grain is sourced from approved suppliers which includes larger cooperative farmer owned grain stores and general merchants with some off farm supplies.

The Board of Directors for Whitworth Bros Ltd includes the Chairman, Managing Director, Finance Director, Milling Director, Sales Director and Purchasing Director. This Board reports to a Board of Directors for Whitworth Holdings Ltd which is the umbrella company, also based in the UK.

We work closely with our main suppliers and customers; with our employees and their representatives (including Unite, our recognised union); and with other trade bodies such as NABIM, and comply with the SMETA Best Practice Guidance in order to ensure the highest level of compliance with food manufacturing standards and ethical trading initiatives.

Responsibilities

The **Directors** of Whitworth Bros Ltd are responsible for overseeing our efforts to eliminate modern slavery and for monitoring progress against the KPIs contained in this document. Progress is measured regularly and is on our rolling agenda for quarterly Board meetings.

The **HR Department and our Line Managers** are responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, with guidance from our lawyers, and that any agencies used are appropriately checked and commit to ethical standards.

Line Managers are responsible for upholding our “core values” and for ensuring that employees who work for them also behave in accordance with these core values.

Our **supply team** are responsible for ensuring that appropriate checks are made prior to any orders being placed with new suppliers. In addition, where judged appropriate, new and existing suppliers are visited on site to ensure adherence to our standards of ethically transparent supply chains.

Our **Sales Director** and **QA Department** work with our major customers to provide them with appropriate information on our modern slavery and to gain suggestions and feedback.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This statement reflects our commitment (and details the action we have taken) to act ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Documentation

Since 2014 we have issued our strategic suppliers with our Ethical Statement for Suppliers and required them to sign to confirm that they comply with this and let us know if they have any issues in doing so.

We comply with the SEDEX Best Practice Guidance and are accredited via the SMETA Ethical Trade Audit. This covers labour standards, health and safety, environment and business ethics.

Actions

Employees: all new employees are appointed directly and checks made of their right to work in the UK. We conform to the ethical standards set out in the SMETA accreditation process. There is no forced, bonded or involuntary labour. Staff turnover is very low and all overtime is voluntary.

Agency workers: we only use agency workers where absolutely necessary and for temporary placements. We ensure the suppliers we use have given us written confirmation that no agency worker is being exploited as part of any slavery or human trafficking. In order to ensure that there is no forced, bonded or child labour, Line Managers check during the induction of any agency worker that he/she is aged over 16, has not paid any recruitment fees in order to procure the work, has not been required to forfeit his/her passport and is free to leave the agency if he/she wishes.

Suppliers of raw materials: we embrace socially responsible trading and all suppliers are issued with our Ethical Statement for Suppliers which they commit to and which sets out key minimum standards relating to employment and workers.

Major suppliers: all are requested to report to us the steps that they are taking to eliminate modern slavery.

Customers: we also work closely with our major customers to ensure that we comply with any employment practices and procedures specified in their audits including their systems to mitigate the risks of slavery and human trafficking.

Due diligence, monitoring and auditing

All major wheat suppliers are issued with our Ethical Statement for Suppliers and are required to sign and return a commitment ensuring that their businesses and supply chains are free from modern slavery.

Our supplier contracts have been updated to include clear provisions that require our suppliers to commit to ensuring that there is no modern slavery, both within their own business and also within their own supply chain (including anyone with whom they sub-contract). Suppliers will be required to self-certify their compliance with the Ethical Statement and contractual provisions will also include that we may undertake ad hoc site visits, audits and regular monitoring, or end the contract early, and without penalty to us, in the event of a breach.

Penalties for breach

If a supplier is found to be involved in any form of modern slavery, its contract will be terminated either immediately or on its due renewal date, depending on the severity of the breach.

Contractual penalties may be awarded against any supplier for a breach of contract, or for incorrect self-auditing responses, questionnaires or the giving of incorrect information.

If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, he/she will be subject to the Company's disciplinary procedure.

Training

The Company provides suitable training to managers and employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.

Relevant employees and managers are informed of any updates to our HR policies via email. In addition, workers and managers have all been trained in the standards for Forced Labour, Child Labour, Discrimination, Harassment and Abuse as part of our Ethical Standards Policy. Refresher training will be carried out as and when deemed necessary.

Related policies

We have the following HR policies in place for employees:

- Core Values Statement
- Ethical Standards Policy
- Whistleblowing Policy
- Grievance Procedure
- Equal Opportunity Policy
- Bullying and Harassment Policy
- Recruitment and Selection Policy

These are referenced in our employee handbook and copies are readily available on our shared network drive in the Company Policies and Procedures folder. Hard copies are kept in folders in those departments without access to a computer.

All HR policies are reviewed on an annual basis to ensure they are legally compliant, in line with our ethical standards and fit for purpose.

Key performance indicators for monitoring and review

We use the following means to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or our supply chains:

- Sales and Purchasing Teams receive refresher training.
- Regularly revise core values and reissue to all employees.
- Record and monitor complaints raised through our grievance or whistleblowing procedures which relate to modern slavery.
- Record suppliers who are terminated due to allegations of modern slavery.
- Ensure our existing suppliers have signed up to our Ethical Statement for Suppliers.

Declarations

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Whitworth Bros Ltd's slavery and human trafficking statement for the financial year ending March 2017.

Signed by: _____
Name: **Roger Butler**
Director: **Chairman**
Date:

Signed by: _____
Name: **Mike Peters**
Director: **Managing Director**
Date:

Signed by: _____
Name: **David Goddard**
Director: **Finance Director**
Date:

Signed by: _____
Name: **Horatio Growdrige**
Director: **Purchasing Director**
Date:

Signed by: _____
Name: **Graham Armstrong**
Director: **Sales Director**
Date:

Signed by: _____
Name: **Matthew Whiteside**
Director: **Milling Director**
Date: