

## MODERN SLAVERY STATEMENT

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### 1. Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that we have taken and continue to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

"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<sup>st</sup> March 2018.

### 2. 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 380 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.

### 3. 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 statement and policy 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.

### 4. 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.

In October 2017 we replaced our Ethical Statement for Suppliers with a Supply Chain Code of Conduct. Our Supply Chain Code of Conduct sets out the full details of the minimum standards for employment and working conditions that we require from our suppliers.

Also, in October 2017 we added our “Commitment to the ETI Base Code” to our suite of policies for our employees and workers and how to report any concerns.

In February 2018 we launched our “Agency Workers Agreement” which all agency staff are required to sign on their first day with us. This agreement confirms that the agency worker is not being treated inhumanely by the agency; and provides information on how to raise any concerns.

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.

## 5. 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. The agency worker is asked to sign our "Agency Workers Agreement" to confirm that they are not being treated inhumanely and that they are aware of how to raise any concerns.

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.

## 6. Risk Assessment and Due Diligence

The risk of slavery and human trafficking within our own organisation is substantially avoided and mitigated as a result of strict policies and procedures; as well as the oversight built into our business operations, and the knowledge and skill of our staff. We assess risk based on a number of factors such as geographical risk indices pertaining to human rights, the level of supply chain control, external governance factors and the levels of political stability.

We consider that the most significant risk of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control.

We undertake due diligence when considering new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include;

- Mapping the supply chain broadly to assess particular products or geographical risk of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risk of each new supplier. This is achieved by using a third-party company (Verisio Ltd) to send out cloud-based desktop audits which are reviewed by qualified social compliance auditors.
- Where the desktop audits identify risks, corrective action plans are sent out to our suppliers that are not meeting compliance or our expectations.
- Conducting supplier audits using accredited third-party auditors.

- Invoking sanctions against suppliers that fail to improve their performance in-line with an action plan. Serious violations of our policies, lead to termination or our business relationships.

## 7. Penalties for breach

If a supplier is found to be involved in any form of modern slavery, its contract may 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, they will be subject to the Company's disciplinary procedure.

## 8. Training & Awareness

We ensure that we have competency within our organisation, through training relating to human rights and the awareness of the social accountability standard SA8000. We use accredited third-party supplier auditors (Verisio Ltd) who are trained social compliance auditors to work and advise our management team and employees.

Human rights awareness training has been further directed to personnel who work in human resources and corporate affairs. Specific supplier standards training is directed at procurement personnel. More general awareness is available throughout the wider organisation through our relevant policies.

## 9. Related policies

We have the following HR policies in place for employees:

- Employee Handbook
- Commitment to the ETI Base Code
- 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.

## 10. 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:

- Through our new agreement with Verisio:
  - We will be conducting awareness training.
  - Our supply chain will be mapped
  - Our suppliers will complete self- assessment questionnaires via Versio's portal

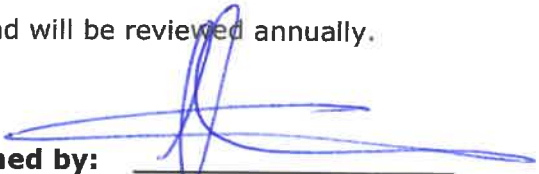
- Our suppliers will be given a risk rating
- On-site auditing will be carried out where necessary with our high risk suppliers and corrective action follow ups performed where necessary.
- Regularly review and revise our core values and Company policies.
- Record, monitor and follow up complaints raised through our grievance or whistleblowing procedures which relate to modern slavery, ensuring that all necessary remedial action is taken.
- Record suppliers who are terminated due to allegations of modern slavery.
- Ensure our existing suppliers have signed up to our Supply Chain Code of Conduct.

## 11. Board of Directors Approval


Whitworth Bros Ltd will never knowingly enter into a business relationship with any organisation involved with slavery, servitude or human trafficking. The senior management of the company accepts responsibility for the implementation of any policy in relation to this matter and for the provision of adequate resources to ensure that slavery, servitude or human trafficking is not taking place in the company or its supply chain.


This statement has been approved by the Directors and will be reviewed annually.

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

Signed by:   
 Name: Mike Peters  
 Director: Managing Director  
 Date: 13/9/18

Signed by:   
 Name: David Goddard  
 Director: Finance Director  
 Date: 13.09.18

Signed by:   
 Name: Horatio Growdrige  
 Director: Purchasing Director  
 Date: 17.09.18.

Signed by:   
 Name: David Wood 16.9.2018  
 Director: Sales Director  
 Date:

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

Signed by:   
 Name: Michael George  
 Director: Family  
 Date: