



## Modern Slavery Act 2015

### Modern slavery and human trafficking statement

#### Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking. We follow the Ethical Trading Initiative (ETI) Base Code which is a recognised code of business practices measuring social performance.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes slavery and human trafficking statement for the financial year ending 2018.**

#### Organisational structure

We are a provider of Meat, Poultry and cooked Meats in the public sector.

We are an East Midlands provider of meat products which are cut in house. We employ 160 people.

We have a global annual turnover of £22M.

#### Our supply chains

Our supply chains include: Farmers, Food Wholesalers, Markets, Restaurants, Hotels, Universities, Hospitals, Schools etc.

#### Our policies on slavery and human trafficking

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.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting 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.

## Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.
- Written information about terms and conditions of employment are provided.
- Employment is freely chosen (ETI)
- Freedom of association and the right to collective bargaining is respected (ETI)
- Working conditions are safe and hygienic (ETI)
- Child labour shall not be used (ETI)
- Living wages are paid and meet the minimum legal and industry benchmark standards (ETI)
- Working hours are not excessive (ETI)
- No discrimination is practiced (ETI)
- Regular employment is provided (ETI)
- No harsh or inhumane treatment is permitted (ETI)

## Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

The business intends to review its agreements and dealings with suppliers to ensure compliance with anti-slavery measures. Current measures include clauses in supplier agreements as well as audits.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Human resources
- Food Safety
- Senior Managers

The compliance team is led by Jane Taylor (General Manager).

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

## Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) 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 supply chains:

- Audits by our Quality Manager on compliance of our suppliers with Modern slavery and human trafficking;
- Communication and personal contact with the next link in the supply chain and their understanding of, and compliance with our expectations.

## Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

1. Consider specific training for employees who are at a risk of exposure to slavery and trafficking, such as our Human Resources Manager and Senior Manager;
2. Draft and regularly review a specific company policy regarding these issues;
3. Review any other policies that could be related, such as the policies on bribery and corruption and human rights;
4. Introduce standard terms with suppliers to make sure these policies are being enforced throughout the supply chain;
5. Establish and regularly review clear supply chain due diligence and audit processes designed to identify and eliminate any slavery or trafficking;
6. Engage more closely with suppliers on a practical level to resolve any issues around slavery and trafficking.

MANAGING DIRECTOR – RICHARD TAYLOR

OWEN TAYLOR & SONS LTD

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