



Modern Slavery Statement 2021/2022 (Pastry Division)

This statement is in response to the Modern Slavery Act 2015 and outlines out the Pastry Division's commitment to identifying and preventing modern slavery and human trafficking in any part of its business and supply chain.

Introduction

There are now as many as 40 million people in modern slavery, globally. It is estimated there are at least 10,000 modern slaves in the UK.

The Pastry Division holds a zero tolerance position on slavery and human trafficking, and will not tolerate or condone any form of slavery or human trafficking within any part of its business or supply chain.

The Pastry Division is committed to developing and adopting a proactive approach to tackling slavery and human trafficking through its robust policies, procedures and recruitment process.

Our Business and Supply Chain

The Pastry Division is the premium producer of chilled savoury pastry products in the UK, with five sites across England, and 3200 colleagues. Each site has its own area of savoury specialism, with expert teams focussed on category-leading innovation continually delivering premium quality products and service to new and long standing customers.



Our Group brands include the famous Pork Pies and Walls products.

Our supply chain consists of suppliers from around the world, varying across an array of sectors providing raw ingredients, materials and services. At various times of the year, for example, Christmas, we will get specialist ingredients from around the world specific to a certain region, for example, Clementines from Italy.

The Pastry Division has five sites, all of which manufacture chilled savoury products in the UK:

Dorset Foods – Shaftesbury

Riverside Bakery – Nottingham

Tottle Bakery – Nottingham

Poole Bakery - Poole

Palethorpes Bakery – Market Drayton

The Head Office (central) which is situated at our Tottle Bakery site, consists of functions such as Technical, Procurement, Commercial, Finance, and Marketing.



Due Diligence

The Pastry Division realises that the potential risk of slavery and human trafficking is a modern day existence and can occur both internally and externally, especially when dealing with suppliers and third parties. We have assessed where potential risks may occur and have put the following measures in to place to ensure that modern slavery is eradicated within our business and supply chain:

Supply Chain

Working with new and existing suppliers, we have made it a minimum requirement as part of our Ethical Code of Practice for all suppliers to join Sedex, a collaborative platform for sharing responsible sourcing data on supply chains. They must also adhere to the ETI base code, an internationally recognised code of labour practice. We are currently working with our supplier base to achieve this.

Temporary Labour Provider

Audits of our labour agency provider are conducted twice a year to assess their ethical and legal compliance.

Supplier Audits

Our internal auditing team carry out supplier audits throughout the year to ensure they are operating in line with our Ethical Code of Practice.

Stronger Together

The Pastry Division is a Business Partner of Stronger Together which is a multi-stakeholder initiative aiming to reduce modern day slavery. Each site has a senior person with overall responsibility for implementing site 'Tackling Modern Slavery' policy and good practice.

Employment

As part of our terms and conditions with recruitment agencies, key requirements to mitigate slavery are incorporated.

A robust recruitment policy and set of practices exist, in line with UK legislation, including right to work document checks, contracts of employment and ensuring that personal information provided is genuine. The Pastry Division are also members of Associate of Labour Providers.

Policies/Procedures

We have various policies and procedures in place to further our commitment to tackling modern day slavery :

- Employee disclosure policy
- Dignity, Diversity & Equality
- Modern Slavery and Forced Labour
- Right to work
- Bullying and Harassment
- Bribery and Corruption
- Ethical Trading
- Ethical Code of Practice
- Recruitment Policy
- Trade Union Agreements
- SEDEX membership
- ALP membership

Accountability

While our Human Resources functions take a lead role on upholding human rights, all our departments are accountable and work together to achieve our goals.

Training and Communication

- The Pastry Division are members of the Association of Labour Providers (ALP), and our Recruitment and HR functions have access to their specialised training and events.
- As Business Partners of Stronger Together, we can access training materials and attend appropriate training courses, such as Tackling Modern Slavery in UK Businesses.
- All new employees are provided with Modern Slavery training within their induction and this is also included in the employee handbook.
- Posters are displayed throughout all sites in key languages on how to raise awareness

- Confidential post boxes are available at each site to enable reporting of any reports or concerns of human trafficking.
- Our Human Resources departments and line managers regularly attend training sessions to keep up to date with their knowledge and skills.
- All employees have details to Ethics Point should they wish to report any suspicion of hidden worker exploitation anonymously.



Key Performance Indicators

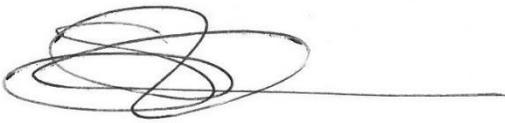
KPI's will be monitored to ensure that The Pastry Division is doing everything in its power to remove modern day slavery by:

- Ensuring all new and existing employees are introduced to Stronger Together / modern day slavery;
- Working with our suppliers to join Sedex;
- Guaranteeing all six The Pastry Division sites renew their Stronger Together Business Partner relationship annually;
- Monitoring that no whistleblowing reports surrounding human slavery are reported.
- SEDEX SAQ 100% & Quarterly Reviews
- Ethical Audits carried out at prescribed timescales, NC close out,
- Labour Provider audits & Contractors Bi-Annual
- Quarterly Audits of Data – Bank, NI, Addresses
- Employee Survey/Satisfaction
- Training Records – Site Leader Modern Slavery Champion, etc. from policy/process &

- Quarterly & Annual Reviews of Modern Slavery, Ethical Trading, Human Rights – clear action plans in place
- Supplier engagement with Ethical Trading COP Requirements, SEDEX, SAQ, Audits

Endorsement of this Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act (2015) and approved on behalf of the Board of Directors of The Pastry Division on 17 March 2022.



Deborah Bolton

Chief Executive Officer

