

## Modern Slavery Act Transparency Statement - 2019

Modern slavery is a global issue that requires global action. It can occur in many different forms including, but not limited to, forced labour, child labour, domestic servitude or human trafficking. Speedibake is committed to a programme of activities that limit the potential risk of modern slavery and human trafficking occurring in its own business or within its direct supply chain. The company acknowledges the provisions of the Modern Slavery Act 2015 and commits to complying with its obligations to ensure transparency within its business activities.

## **Our Business**

Speedibake is part of ABF Grain Products Ltd and carries out private label frozen bakery operations with over 500 direct employees across our two sites at Bradford and Wakefield in Northern England. The business is supported by a carefully selected and licenced labour provider to meet fluctuations in demands and seasonal needs.

As part of the company due diligence process Speedibake has:

- Appointed a Board Member and steering committee to oversee compliance with the Modern Slavery Act which includes representatives from Technical, HR and Supply Chain
- Reviewed existing Speedibake Policies that help to identify potential risk and support tackling modern slavery where it is found to occur
- Continued to work as a Business Partner with the 'Stronger Together' initiative
- Completed a risk assessment to identify the risks of modern slavery and remediate issues of compliance if identified in the business or in the wider supply chain on a case by case basis
- Reviewed all commercial contracts with our suppliers to ensure they are aware of their obligations under the terms of The Act and request that they sign up to the ABF Code of Conduct, or have an appropriate Code of Conduct in place

Speedibake will continue to assess its internal processes to assure consistency and compliance in implementing good practice in the following areas on an ongoing basis:

- Management Systems
- Recruitment Process
- Labour sourcing
- Training, Awareness and Communications
- Worker records analysis to identify potential risk areas
- Workplace monitoring
- Worker engagement
- Providing access to remedy if concerns are raised by workers

As part of the above, Speedibake has already introduced several activities to evaluate the businesses' compliance with the Act that includes:

- Annual auditing of the processes operated by the licenced third-party agency through which we recruit temporary labour
- Undertaking the Sedex Self-Assessment process and review Sedex data relating to our suppliers (see below)
- Undertaking SMETA Ethical Audit Training for key personnel in HR and Technical
- Reviewing 'Expolink' reports



## **Our Supply Chain**

Speedibake sources most of its raw materials (ingredients and packaging) through a European supply base, however a small percentage of the ingredients and component materials may have originated from worldwide origins. The supply chains in most cases are complex and often involve agents and brokers that makes total traceability and transparency very difficult to achieve.

The company will, through its ethical risk assessment and monitoring activities seek to identify those chains which have the highest risk of potential modern slavery or human trafficking. Where high risks are identified we will undertake remediation and mitigating plans on a case by case basis and will involve seeking expert advice and collaboration with other companies where necessary.

Speedibake's due diligence approach requires:

- All our suppliers to comply to the ABF Code of Conduct which is based on the Ethical Trade Initiative (ETI) base code and the International Labour Organization (ILO) convention. This is asked of new and current suppliers as part of the agreed "Terms and Conditions" and through sign-off of our ABF Code of Practice (our technical terms which are regularly reviewed).
- Our suppliers to be registered on Supplier Ethical Data Exchange (SEDEX) or a suitable equivalent.
- That we review our ethical risk assessment on a minimum annually or when horizon scanning highlights possible issues within our ingredients and packaging raw materials supply chains.
- Where deemed appropriate Tier 1 Suppliers with high risk supply chains are required to complete a SMETA audit as a minimum every 3 year.

The information gathered through the above activities will be regularly assessed by the steering committee; the process and procedures will be reviewed annually

This statement will be reviewed each financial year and published on the company website.

Signed:

Name: Steve Barton

Date: 23.66.19

Title: Managing Director