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### **Modern Slavery and Human Trafficking Statement (FY15-16)**

The Jordans & Ryvita Company, a division of ABF Grain Products,  
Associated British Foods plc

#### **Introduction**

As a business with a track record of engaging with environmental issues, we recognise that we have a responsibility to take a robust approach to prevent modern slavery and human trafficking. This statement sets out The Jordans & Ryvita Company's (or Jordans Dorset Ryvita's) actions to understand all potential modern slavery risks related to our business and the steps we take to try and ensure that there is no slavery or human trafficking in our own business, or our supply chains. This statement relates to actions and activities during the Financial Year 13th September 2015 to 17th September 2016.

#### **Organisational structure and supply chains**

The Jordans & Ryvita Company operates in the Food Manufacturing Industry. We currently operate in the following countries:

- UK 1 Head Office and 4 Manufacturing sites
- Australia 1 Sales Office
- Canada 1 Sales Office
- France 1 Sales Office

The Jordans & Ryvita Company has a global supply chain, and in some cases we purchase ingredients from extended supply chains involving traders and brokers. We are taking steps to identify high risks in these supply chains.

Sustainability and Responsible Sourcing is important to our business and we have made a "Good Food Commitment" which sets out our approach to Corporate Responsibility in relation to the nutritional qualities of the products we manufacture; the ingredients we purchase in order to make those products and the operational processes through which we manufacture those products. Two of the four strategic pillars of our Good Food Commitment relate to our ingredient supply chains, namely; International Supply Chains and UK Cereals (which are the single largest commodity that we purchase by volume.) In order to oversee our work on Corporate Responsibility as a business we operate a CSR working group, which oversees the implementation of our policies with regards to ensuring ethical and environmental standards in our supply chain, and a Sustainability Governance Committee, which includes independent external representatives and provides Assurance on the delivery of our strategy to The Board of Directors.

#### **Policies**

We have reviewed our procurement policies and procedures to ensure that they incorporate the appropriate requirements in line with ILO standards; The ETI Base Code and the Modern Slavery Act, as specified within the latest version of the ABF Supplier Code of Conduct. We are currently in the process of updating these Policy documents and training all relevant management teams within our business on their content, as well as procedures to ensure their proper implementation.



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We have communicated the latest version of The ABF Supplier Code of Conduct to new raw material suppliers and will be broadening this communication to all our suppliers over the course of the coming Financial Year.

To help us raise awareness and mitigate risk we have introduced a policy within HR, in accordance with guidance from 'Stronger Together', which will support us during the recruitment and employment of permanent employees and temporary agency employees.

### **Our People – Due Diligence**

We recognise that our supply chains are not the only area where people may be at risk of Modern Slavery in the context of our business. As such checks have been undertaken within our own business operations to identify any areas of concern associated with shared addresses or bank accounts for existing employees. These checks will be maintained for all future employees. To date there have been no issues of concern identified. When recruiting we follow good practice approaches to identification and reference checking and our agency suppliers comply with our Recruiter Compliance Principles and each are fully licensed. We recognise that temporary workers are a particular risk in respect of modern slavery and we will continue to work closely with these organisations to mitigate the risk of potential labour exploitation.

We operate a whistleblowing policy which is communicated to all employees via noticeboards and posters. We encourage our people to report any concerns they may have either regarding circumstances that may give rise to an enhanced risk of slavery or human trafficking or to a specific situation which causes them concern. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation, and we have had a confidential whistleblowing hotline in place since 2011, with posters displayed around our sites.

### **Training and Awareness**

Using training material from Stronger Together employees in our Procurement and HR teams have received briefing on the signs and risks associated with Modern Slavery and Hidden Labour exploitation.

Our Buyers in the Procurement team will be provided with further more detailed CSR training which includes section on Modern Slavery in order to provide them with a more detailed understanding and expectations of this. Additionally we have trained a number of our team members in social systems auditing (SA8000 Lead Auditor training). These individuals don't operate as ethical auditors on our behalf but are using that training to help them understand and assess the information provided by agencies/suppliers.

We are also raising awareness of the signs and risks associated with Modern Slavery amongst our manufacturing population with line manager briefings and team briefs and have identified specific members of our population for who we will provide more detailed briefing for example, security and reception staff who often see people arriving or leaving our sites.



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### **Our Supply Chains - Due diligence/Risk Assessment**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. As part of our standard contractual terms we require all our suppliers to operate to our 'Terms and Conditions of Purchase', which includes a specific requirement to operate according to recognised ethical business standards.

We link to our Suppliers on Sedex and our processes include 3 stages of risk assessment plus remediation and reporting. Our risk assessment includes 1) a high level risk and materiality assessment to identify where inherent risk lies in relation to our brands, 2) supply chain mapping and 3) an ethical risk assessment. We use a range of qualitative and quantitative data sources to conduct our risk assessments including but not exclusive to; Sedex, Verisk Maplecroft, BRC and 4 pillar SMETA audit data. To date we have carried out an initial assessment of high risk supply countries and sectors and have begun to identify remediation actions should evidence of Modern Slavery be identified. Our next steps are to complete the mapping of the majority of our manufacturing materials, complete the risk assessments and discuss preventative and training programs with our suppliers.

We monitor and review supply chain risk routinely and we have procedures in place to escalate high risk issues where necessary. We have implemented a due diligence approach to identifying risk and prioritising activity within our supply chains and, where we find issues we will work in collaboration with our Suppliers, where possible, to improve standards within our supply chains. For example we continue to invest in a project for our Brazil nut supply chain and we are working closely with our Suppliers and an external consultancy to assess the supply chain, identify remedial actions and interventions to reduce risk and improve standards. While we have not found any specific instances of modern slavery to date, in our next steps we will identify those initiatives that will reduce any risk of it.

### **Performance indicators/M Measurement**

We are working to develop the right long term measurements for both supply chain and people. In the meantime we are tracking the risk rating of our key suppliers and we will be measuring the number of people who have attended awareness sessions.

This statement has been approved by the organisation's board of directors, who will review and update it annually.

**Director's name: Paul Murphy**

**Date: 25<sup>th</sup> October 2016**

**Director's signature:**

A handwritten signature in black ink, appearing to be 'Paul Murphy', written over a white background.