

WESTMILL - MODERN SLAVERY ACT STATEMENT

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015: *"slavery, servitude and forced or compulsory labour"*. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Westmill's slavery and human trafficking statement for the financial year commencing September 2017 and ending September 2018.

ORGANISATIONAL STRUCTURE

Westmill is a UK based business with operations across four UK manufacturing sites and one sales office based in the Netherlands. We are one of Europe's largest specialist food companies, manufacturing and distributing mostly Asian foods and goods into the Asian diaspora wholesale sector, restaurants and takeaways as well as the UK Retail Sector, Food Service and Business to Business channels. Westmill is wholly owned by Associated British Foods plc.

Westmill sources both raw materials and finished goods from around the world and works with a diverse portfolio of suppliers. We also have a number of license agreements with other food manufacturers for the distribution of their branded products into the UK and other European markets.

We permanently employ approximately 360 people in the UK and 8 in mainland Europe. We also engage temporary labour at sites, both directly and via labour agencies, to cover changes in seasonal demand for products. We outsource other services, such as distribution, cleaning and security to third party providers.

OUR POLICIES

The company is committed to creating an environment and culture where employees feel that they can give of their best in helping to build a great business. The company has a range of policies and procedures in place that provide direction on what employees can expect from the business and what the business expects from them. Our Resourcing and Employment Policy sets out our employment principles, whilst our policy on Preventing Hidden Labour Exploitation specifies the measures we take to limit the possibility that hidden worker exploitation could take place at any of our sites.

We have a robust process for reporting slavery and human trafficking through our confidential whistleblowing hotline which is an established and trusted channel for employees to report issues in our business.

We acknowledge that one of our key risk areas is our usage of temporary labour and we are working with our licenced labour providers so that they understand our expectations of them in taking the required proactive steps to address hidden labour exploitation. We actively audit our agencies who supply us with temporary labour against legislative compliance. This includes both ensuring the temporary

labour they supply is eligible to work in the UK and compliance with the Modern Slavery Act.

We also make sure that all of our recruitment and outsourcing partners are aware of, and agree to, the principles of our policy and we expect them to communicate to us the steps they take in their own organisations to prevent hidden labour exploitation. This will also require these Agencies to sign-up to our Supplier Code of Conduct (which is based upon the ABF Supplier Code of Conduct) and provide us with copies of their ethical policies.

All of our UK Manufacturing Sites have been independently ethically audited against the Ethical Trading Initiative (ETI) basecode and we ensure that these audits are conducted every 3 years.

All Suppliers (supplying raw and packaging materials as well as finished and licensed products) are requested to sign our Westmill Supplier Code of Conduct which explicitly refers to the ETI basecode and contains reference to our business policies in relation to slavery and human trafficking.

Suppliers are encouraged to share their Ethical Policies with us and provide access to any Third Party Audits that have been conducted. We also request that all Suppliers (supplying raw and packaging materials as well as finished and licensed products) are a member of Sedex or a similar electronic platform and provide us with insight into this information.

The Westmill Corporate Responsibility Policy is reviewed and adapted annually to reflect any changes in the Business. Any amends required are agreed with the Westmill Board of Directors.

DUE DILIGENCE PROCESS

The business is undertaking an extensive supply chain mapping and ethical risk assessment process which will be ongoing and will inform future Procurement Policy.

RISK MANAGEMENT

As set out in this statement we have a robust approach to identifying and tackling modern slavery in our supply chains. We have a good oversight of our direct suppliers' operations and are working to improve transparency beyond this through our comprehensive supply chain mapping project in collaboration with all suppliers in scope.

Where there is an identified risk of slavery or human trafficking (either in country or in the Industry sector as a whole) Westmill will undertake appropriate remediation steps. This will be addressed on a case by case basis and the Business will seek expert advice where appropriate to address any identified issues.

EFFECTIVENESS AND PERFORMANCE INDICATORS

Our approach to Ethical Trade includes our focus on tackling modern slavery. We have established Key Performance Indicators (KPIs) to demonstrate the progress made here such as: social auditing, improving supply chain transparency and supplier training. The effectiveness of the processes established to limit the

possibility that slavery and human trafficking could take place is also measured against KPIs as appropriate.

TRAINING CAPACITY

We recognise that our suppliers and workforce have a significant role to play in tackling modern slavery. We are working to ensure that they are equipped with the right knowledge and skills to do so.

Senior Management, key Procurement and Technical staff have received Ethical Awareness Training and specific training on the objectives of the Modern Slavery Act and the prevention of slavery and human trafficking in supply chains.

Our procurement team has been trained on the ETI base code, Sedex, and the social auditing process. We have also begun running internal sustainability sessions across all business functions. These cover a range of topics including ethical risk and modern slavery.

We continue to raise awareness of slavery and human trafficking issues throughout the business, adopting some of the key elements of the 'Stronger Together' programme across our sites as part of our new employee induction programme, and via internal poster campaigns and presentations at team briefings. In financial year 2017 over 90% of our line managers completed 'Stronger2gether' e-learning training and our agency labour providers also conducted the training to relevant staff members.

Ethical training materials and particularly MSA aspects are included in induction training sessions and are available through the company intranet for ongoing guidance as required.

STATEMENT REVIEW

This statement will be reviewed and updated annually and published on our website.

Nicolas Hanson
Managing Director
Westmill