

# Modern Slavery Statement

## Modern Slavery and Human Trafficking Statement (FY16-17)

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

### Introduction

As a professional and ethically responsible business and employer 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 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 18th September 2016 to 16th September 2017.

### Organisational structure and supply chains

The Jordans & Ryvita Company (referred to as Jordans Dorset Ryvita or JDR) 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
- Brazil – 1 Sales Office

JDR has a global supply chain, and in some cases we purchase ingredients from extended supply chains involving traders and brokers. We have taken steps to identify high risks in our supply chains and continue to monitor our risk assessments as required.

Sustainability is important to our business in all areas, from the ingredients we buy through to the products we make and how we make them. This business wide focus is manifested through the JDR "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. We continue to devote two of the four strategic pillars of our Good Food Commitment to responsible sourcing, namely International Supply Chains and UK Cereals (which are the single largest commodity that we purchase by volume.) The work of the Good Food Commitment is sponsored by the board and overseen by a panel of external experts through a Sustainability Governance Committee. We also operate an internal CSR working

group to manage the day to day implementation of the Good Food Commitment. In this way we are able to promote sound ethical and environmental standards across the business and capture the latest insights in Corporate Responsibility.

## **Policies**

Our procurement policies and procedures 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. Appropriate training has been conducted with the relevant managers to ensure these policies and processes are correctly implemented. In addition we are currently focusing on establishing a regular review process to guarantee that both policies and training levels remain relevant and well understood.

We have communicated the latest version of The ABF Supplier Code of Conduct to all of our raw material suppliers and continue to include this as a provision of supplier approval for new suppliers.

To help us raise awareness and mitigate risk we have a policy titled Preventing Hidden Labour Exploitation in Our Business, this supports us during the recruitment and employment of permanent employees and temporary agency employees. The HR team has responsibility for this policy and it was drafted in accordance with guidance from 'Stronger Together'.

## **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 are undertaken within our own business operations to identify any areas of concern associated with shared addresses or bank accounts for existing employees. These checks are undertaken on a regular basis and to date there have been no issues of concern regarding Modern Slavery 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 is fully licensed. We recognise that temporary workers are a particular risk group in respect of modern slavery and, whilst we currently work closely with our existing suppliers to mitigate the risk of potential labour exploitation; to support us to be even more effective we have made the decision to work with a single agency who will work directly with temporary worker suppliers on our behalf (a neutral vending solution). This third party will work directly with our suppliers, applying thorough auditing and compliance standards which include a focus on ways to mitigate the risk of Modern Slavery.

We have 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 tailored briefings on the signs and risks associated with Modern Slavery and Hidden Labour exploitation.

Our Buyers in the Procurement team have been provided with more detailed CSR training including a section on Modern Slavery in order to provide them with a more detailed understanding of this issue and its relevance to their roles. This training will be refreshed annually for all relevant employees and we are investigating the best ways to update and extend the training as required. As well as formal training, the buying team has been actively involved in the development of supply chain mapping and MSA risk assessment. Their contributions have been central to the development of these processes and we have observed a significant increase in their awareness and sensitivity to the risks of MSA.

To provide further assurance, a number of our team members are also trained on social systems auditing (SA8000 Lead Auditor training). These individuals do not operate as ethical auditors but are using that training to help them understand and assess the information provided by agencies/suppliers.

We have been focused on increasing awareness levels amongst our suppliers and we have worked closely with several suppliers in the supply chain mapping activities discussed below. In addition we invited a number of suppliers to participate in a Stronger Together training day. This year we are focused on understanding any further needs for supply training and rolling this out as required.

We have also increased awareness on the signs and risks associated with Modern Slavery across our Management, Head Office and Manufacturing populations. We conduct team briefs within manufacturing on an annual basis and have provided specific members of our population, such as those who manage large numbers of employees and our security and reception staff with more detailed briefing sessions. Refresher training will take place annually. The more detailed briefing sessions have resulted in an increased level of awareness and, whilst no specific issues

of concern have been identified, we have increased confidence that any concerns will be brought to management attention.

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

The organisation undertakes due diligence when considering taking on new suppliers and regularly reviews 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 have also revised our supplier approval process to increase the levels of rigour applied to MSA risk assessment. This has the additional benefit of driving greater awareness of the importance of this issue amongst our supplier community.

For our key suppliers who provide our manufacturing materials, we link to them on Sedex and carry out a review that consists of 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 completed a high level risk assessment of these categories and mapped the majority of our supply chains, maintaining a focus on those geographies and products which pose the highest risk. Our high level risk assessment is revised quarterly and assesses all raw materials across a number of measures including country of origin and processing, the type of industry and the method of procurement. Our supply chain maps have been designed to further unlock this information, asking more detailed questions about our specific supply chains. This process has enabled significantly greater focus on MSA risk and promoted awareness throughout the team. We are also in the process of reviewing a number of remediation measures to provide further assurances where we believe vulnerabilities may exist. Our next step is to further develop our supply chain map portfolio and bring to life the potential activities that we have identified.

We have also developed a tool to increase the scope of our risk assessments with our indirect suppliers, with a focus on modern slavery. This will allow us to broaden the reach of our controls and identify potential risks across a wide spectrum of indirect categories.

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 have made plans to extend our ethical

audit programme to fully investigate any risks we identify. Where we find issues we will work in collaboration with our suppliers, for example as well as continuing to invest in a project for our Brazil nut supply chain we are also looking at collaborative opportunities in our Hazelnut and Vine Fruit supply chains. We value the input of suppliers in supporting us with this agenda and we also maintain our relationships with external experts and consultants to assess the supply chain, identify remedial actions and reduce risk. While we still have not found any specific instances of modern slavery to date, we maintain our commitment to identify those initiatives that will reduce any risk of it.

### **Performance indicators/Measurement**

To support us in measuring whether the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain are successful we will consider:

- If any reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified within our business
  - o To date no reports have been received
- If our people have been briefed to identify signs of Modern Slavery and how to report any concerns
  - o To date the majority of our UK head office based employees have received either verbal or written briefing. Our manufacturing population, which represents 70% of our workforce, has attended team briefs and nearly 100 employees have attended more detailed training sessions.
- A commitment to complete and internal audit reviewing the efficacy of our processes and supply chain risk assessments
- Whether our high priority suppliers have been briefed on both the signs of modern slavery and the requirements of our supply chain risk assessments

This statement has been approved by the organisation's board of directors. The statement will be reviewed and updated annually.

**Director's name: Paul Murphy**

**Date: 24th October 2017**