



pladis

United Biscuits (UK) Limited

Modern slavery statement 2016

honesty, fairness, mutual respect & non-discrimination

Introduction

This statement is made pursuant to the Modern Slavery Act, 2015, and outlines steps the Company has taken as well as its future plans, towards ensuring the prevention of forced labour and human trafficking within our own organisation and our supply chain.

Our Organisation & Supply Chain

Our baking heritage goes back generations, we bake some of the best loved sweet and savoury biscuits and cakes that are household names including **McVitie's, Jacob's, Carr's** and **go ahead!**

In the UK, we have 4,600 employees across seven manufacturing sites, one distribution centre and four office locations.

Our suppliers are central to our success as an organisation. We base our supplier relations on the fundamental concepts of honesty, fairness, mutual respect and non-discrimination, and we consider it important that we work together with our suppliers to ensure adherence to the standards we expect as a responsible organisation.

We are also committed to working closely with our recognised trade union partners on important matters impacting our employees and our organisation. As such we will engage their support and involvement in ensuring we adopt the best possible approach to the ongoing prevention of forced labour within our organisation and supply chain.

Policies

As part of a global business we operate according to the pladis Code of Conduct which captures the most important personal responsibilities expected of our employees as they go about their work, and provides guidance on how to deal with certain situations. The Code of Conduct expects all suppliers to adhere to this code, and also states that we will not work with suppliers who violate human rights.

Across our UK operations, we follow the standards set out in the Ethical Trading Initiative (ETI) base code, which include :-

- **Employment is freely chosen, where there is no forced, bonded or involuntary prison labour, and where workers are not required to lodge “deposits” or their identity papers and are free to leave after reasonable notice.**
- **Freedom of association and the right to collective bargaining are respected, where workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.**
- **Working conditions are safe and hygienic.**
- **Child labour shall not be used.**
- **Living wages are paid, where for a standard working week these meet minimum, national legal standards and workers are provided with written and understandable information about their employment conditions.**
- **Working hours are not excessive, and comply with national laws, collective agreements and specific provisions of the ETI base code, around the limits of working no more than 60 hours in any seven day period.**
- **No discrimination is practiced.**
- **Regular employment is provided.**
- **No harsh or inhumane treatment is allowed.**

We also operate a Whistleblowing policy which encourages employees to report any circumstances of potentially unethical conduct within our organisation. The content of this policy has been reviewed and amended in line with the Modern Slavery Act.

In addition, we are also in the process of establishing ethical policies specific to our UK & Ireland region, for both Employees and our Suppliers. These will be communicated and implemented in due course, and will incorporate the appropriate standards of the ETI Base Code and the Modern Slavery Act, and our commitment to these.

Our People - Due Diligence

As a member of SEDEX we undergo regular SMETA and customer audits across our UK locations, to ensure we are compliant with the standards of the ETI base code.

When recruiting in the UK we follow good practice approaches to identification and reference checking and as standard we also require these of our agency providers as well, who are also members of SEDEX.

In terms of future plans, during 2017 we intend to establish a process of best practice record checking for potential signs of forced labour within our own business operations. This will include shared bank accounts and address checking of our own employees, as well as those of our agency workers, as an additional means of monitoring for the signs of potential forced labour.

Recognising that temporary workers can be a particular area of risk where modern slavery is concerned, we will be working closely going forward with our agency providers to ensure this risk is effectively mitigated, through ensuring transparency of the agency worker recruitment process and making improvements to our existing agency audit practices, including worker interviews.

Training & Awareness

We have carried out awareness training workshops for senior managers and senior union representatives, with the support of Stronger Together, an organisation we have partnered with specialising in providing guidance and resources supporting organisations to understand their responsibilities around modern slavery in supply chains. This was an initial step taken as part of a wider roll out plan of awareness training, that will be delivered to our line managers, employees (new and existing) and union representatives.

Our Supply Chains - Due Diligence

The organisation undertakes due diligence during the selection process for all new suppliers, and our contractual terms require our suppliers to become members of SEDEX. Through our onboarding process for appointing new suppliers, we review their compliance with all relevant laws and regulations, and we would never knowingly enter into a contractual relationship with any supplier or subcontractor using child labour, violating human rights, or operating under unsafe working conditions.

In support of the planned implementation of our impending new Ethical Policy for Suppliers, which will clearly communicate our expectations of suppliers where the requirements of the act are concerned, we will establish an assurance framework across the supply chain to ensure provisions of the act are met and monitored.

Performance Indicators

We are committed to developing a set of performance indicators which will enable us to monitor the effectiveness of the steps we are taking, and we will establish these as we implement our future plans.

This statement has been approved by the Managing Director, UK & Ireland and as a minimum will be reviewed and updated annually.

A handwritten signature in black ink, appearing to read 'J. Eggleton', with a long horizontal stroke extending to the right.

Signed by Jon Eggleton
Managing Director, UK & Ireland