

pladis

pladis UK and Ireland Modern Slavery Statement

This statement is made in accordance with the Modern Slavery Act, 2015, and outlines the steps pladis UK and Ireland* has taken as well as its future plans, towards ensuring the prevention of forced labour and human trafficking within its organisation and supply chain.



* pladis UK and Ireland is a trading name of United Biscuits (UK) Limited

Business organisation and structure

pladis was formed in 2016 and is the proud steward of more than 300 years of family baking and confectionery experience.

A global snacking company, pladis is based in the UK and is home to much-loved brands including McVitie's and Ulker. We are also pleased to distribute a curated range of Godiva Everyday Luxury chocolates exclusively for consumer-packaged goods channels around the world.

Globally, the organisation has a 17,000-strong global workforce, spans 34 factories in 13 countries, and is founded on collaboration, agility and resilience. Within the pladis UK and Ireland business, there are over 4,500 employees across seven bakeries and one distribution site. We have circa 3,000 suppliers who are a core part of our business success.

3,000
suppliers

4,500
employees

7
bakeries



Our bakeries in the UK

Click on any location to see more details



Our processes and policies

We operate according to the pladis Code of Conduct which captures the most important responsibilities expected of our employees as they go about their work. We expect our suppliers to adhere to the Code and we do not work with suppliers who violate human rights.

In 2017, we worked with independent experts to complete a strategic review of our policies and approach to supply chain human rights. Following this review, we are now in the process of updating our human rights policy which will sit underneath the Code of Conduct and will set out:

- Our governance of human rights risks
- The company's vision on managing human rights
- The scope of the policy
- Our commitment to remedy if any violations of the policy occur

We also updated both our Terms and Conditions for the purchase of goods and/or services and our Technical Fundamentals Document which our suppliers must sign and agree to before any commercial relations can

begin. These documents outline the minimum requirements we expect our suppliers to comply with. We also require our suppliers to become members of the ethical due diligence platform, SEDEX.

pladis operates a whistleblowing policy which encourages employees to report any circumstances of potentially unethical conduct within our organisation.

We are in the process of launching a new pladis ethics hotline providing employees the option of raising any concerns with an independent provider via telephone or confidential website.

We continue to work closely and engage with our trade union partners by providing updates on progress being made, during our quarterly consultation and communication forums.



'We operate according to the pladis Code of Conduct which captures the most important responsibilities expected of our employees as they go about their work.'



Our suppliers

Our suppliers are key to the success of our business, we recognise the importance of working closely with them to ensure that they act responsibly.

For example, we have been working with our wheat suppliers to improve the levels of traceability we have within this supply chain, through this process we now have Back to Farm agreements

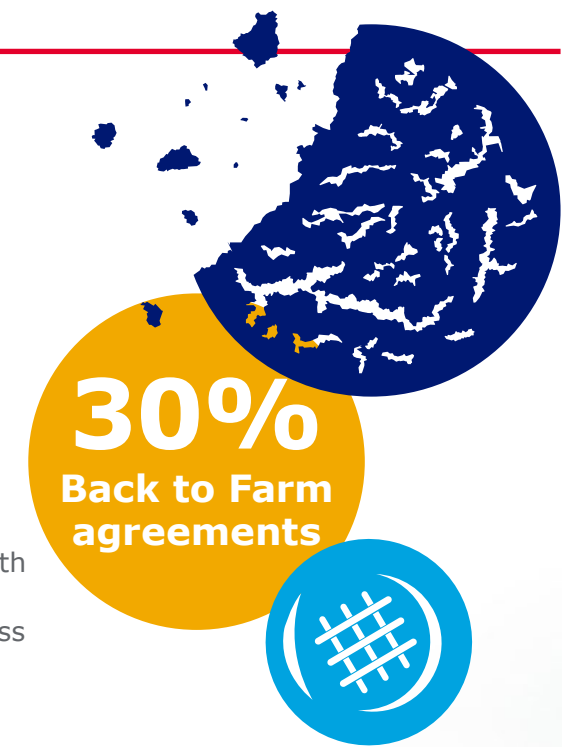
covering over 30% of our total UK wheat supply. In 2018, we will look to run a feasibility study on a responsibly sourced wheat programme which will focus on environmental and ethical areas within our wheat supply chains.

Understanding risks within our supply chains

We own a group of brands with heritage and tradition – as such, we have long and historic knowledge of our supply

chains and where our most salient risks are. Further, we recognise that human rights are universal and not negotiable, and that all risks to human dignity should be addressed.

In 2017, we took the extra step of conducting a supply chain mapping exercise and an in-depth independent third party risk assessment of the pladis business supply chains which enabled us to identify our areas of focus.



Areas of focus

We expect our suppliers to comply with all applicable human rights legislation and laws, however, as a part of our risk assessment, findings showed three key areas in which suppliers need to focus on and take a more proactive approach towards:

Ingredient specific risks:

We make products that include ingredients such as cocoa and palm oil. We recognise that these ingredients have a higher risk of human rights challenges within the supply chains. We have a key role to play in ensuring our

suppliers proactively monitor and address any potential risks.

Child labour:

We recognise that within specific commodity groups deep within some of these supply chains (countries of origin) there is a higher risk of exploitative child labour. Across our entire supply chains, we expect suppliers to take additional steps to manage and mitigate child labour risks. In high-risk countries and industries, we encourage suppliers to be proactive and take additional steps to improve systems, build capacity, monitor operations and take a collaborative approach to reduce these risks from occurring.

Forced and bonded labour:

Our suppliers must commit to the eradication of forced and bonded labour. Although there are different approaches to achieve this, we expect our suppliers, at a minimum, to commit to the following three principles:

- Workers must have freedom of movement.
- Workers must never pay for work, at any stage of their recruitment or employment journey.
- Workers must never be indebted or coerced (through physical or psychological intimidation) to work.



Ongoing due diligence

As a member of the ethical due diligence platform, Sedex, all our UK sites undergo regular Sedex Member Ethical Trade Audits (SMETA) and customer audits, to ensure we are compliant with the required standards.

Screen and recruitment

When recruiting in the UK we follow good practice approaches for both identification and reference checking. We have redesigned our agency audit approach to provide greater focus on the transparency of their own recruitment process,



and approach towards the prevention of forced labour through their own monitoring processes and employee awareness training. We will work with them to implement this during 2018.

Due diligence

As part of our supplier due diligence process and contractual terms we require our suppliers to become members of Sedex.

Onboarding

Through our on-boarding 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 that uses child labour, violates human rights, or operates under unsafe working conditions.

A decorative graphic on the right side of the page. It features a large white circle containing several dark blue hearts. Below this circle is a smaller red circle with a white grid pattern, resembling a globe. The background is a dark blue shape with a yellow and orange curved border.

**Our Sedex
programme covers
suppliers in
34 countries**

Case study: Capacity building through Human Rights training

With the support of Stronger Together, an organisation which works to reduce modern slavery. We've carried out training workshops with our Senior managers and union representatives. Subsequently we have commenced awareness training across our manufacturing and distribution workforces.

We are pleased that more than half our workforce have been trained in our pladis Code of Conduct. In addition, almost 40% have also undertaken specific modern slavery training.

The training has been tailored to different audiences of employees, line managers and senior managers, and we will continue with the roll out of both Code of Conduct and Modern Slavery training throughout 2018. We have also now included both training programmes as a part our new starter induction programme.

In 2018/19, with the support of independent experts, we will deliver bespoke human rights training for our Procurement and Safety, Quality, Security and Environment teams, who work closely with our suppliers, to build their capacity to identify labour exploitation and ensure we continue to work only with suppliers that meet our expectations.



Modern Slavery Awareness Training programme



Plans moving forward

We intend to focus on continuing to raise awareness through specific human rights training programmes to employees who work closest with our suppliers.

In addition, we will continue to deliver awareness training across our wider workforce and to new starters, whilst also implementing and embedding planned improvements to the way we monitor our labour providers in the UK.

We will finalise our supplier human rights policy in 2018, and focus on rolling out the actions it sets out within our supply chain.

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 and constitutes the pladis statement for the financial year commencing January 2017 and ending December 2017.

The Boards of pladis UK and Ireland have reviewed and approved the statement and it has been signed on their behalf.



Signed by Nick Bunker
Managing Director, UK & Ireland

pladis

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