

The Silver Spoon Company – Modern Slavery Statement

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Introduction

The UK Modern Slavery Act, 2015 (MSA) requires businesses to state the actions taken during the financial year to ensure modern slavery is not occurring in their operations and supply chains. In the Silver Spoon Company (SSC) we are fully committed to playing our part in preventing modern slavery in our business and supply chains.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Silver Spoon Company has a zero-tolerance approach to any form of modern slavery. We support transparency and collaboration to eliminate the risks of modern slavery. We have effective systems in place to safeguard against any form of modern slavery taking place within our business or supply chains.

This slavery and human trafficking statement is for the financial year starting September 2023 and it is made in compliance with the MSA. It sets out the steps taken and continues to take by SSC to prevent modern slavery and human rights infringement within our business and supply chains.

Since the Act came into force in 2016, we have gained more insights into the risks and trends relating to modern slavery we continue to implement to strengthen our due diligence approach as a result.

Over the past year –

- We have provided an awareness to colleagues and suppliers to facilitate the identification of modern slavery issues and actions to be taken to prevent the risk of modern slavery and human trafficking from occurring.
- Enhanced our due diligence programme and reporting.
- Undertaken a review of our human rights risks in support of our procurement and outsourcing practices.
- Obtained greater visibility across our supply chain.

Our business activities centre around the sourcing and supply of grocery food products for retail and food service in own brand and customer brands.

Going forwards, we plan to develop our due diligence approach further in order to manage the risks of modern slavery within our business and supply chains whilst considering the mitigation in the unlikely event of breaches being identified.

Our Business & Supply Chains

We supply ambient stable products across the grocery sector in our own brand and in customer own brand. We have two manufacturing facilities in the UK –

- Wheat milling and flour packing – Allinson’s Flour mill
- Sugar processing and packing of syrups, glace fruits, and special sugar products - Bardney Production Plant

We outsource the manufacturing and packing of some of our products across the UK and Africa where we work in partnership with third party suppliers. We endeavour to work in partnership as much as possible to have positive impact and opportunities for people where we operate, creating jobs and opportunities.

To gain understanding of what happens when we are not physically present, we require suppliers to undertake third party approved social systems audits such as SMETA. The audit is carried out on an un-announced basis by third party ethical auditors from an approved social systems audit organisation. Through this type of audit, any issues are identified through worker interviews and observations made during the audit. Furthermore, we engage with our suppliers to find realistic solutions to the issues affecting workers at the sites. Ethical audits are good at capturing issues such as health & safety and wage discrepancies’ and as such serve a vital purpose in the programme.

Independent, confidential hot lines are available to employees within our facilities, and we require the same to be available in our third-party facilities.

The Silver Spoon Company is a member of “Stronger Together,” a multi-stakeholder business-led initiative with the aim of reducing Modern Slavery and other hidden third-party exploitation of workers.

Policies in relation to Modern Slavery

In our approach, we incorporate internationally recognised declarations such as –

- UN Universal Declarations of Human Rights
- ILO Declarations on Fundamental Principles & Rights at Work
- The UN Guiding Principles on Business & Human Rights
- The Base Code of the Ethical Trade Initiative (ETI)

Governance

Our policies and procedures incorporate internationally recognised human rights standards. We conduct regular reviews and monitoring to ensure that there is conformance in the supply chains. Our ethical compliance programme is led by Head of Technical & Ethical Compliance and Head of Procurement. Governance and progress monitoring sits with the Ethical Compliance team and reviewed with the Human Resource Director and the Sourcing Director. We expect our suppliers to monitor and enforce standards in their own operations and supply chains. We have an Escalation Policy that captures any issues that arise.

Ethical Compliance Due Diligence

We have due diligence processes in place for identifying and mitigating the risks of any modern slavery or human trafficking taking place in any part of our supply chains and business operations. We share our Policies with our direct suppliers with a fundamental requirement that they in turn communicate the requirements to their own supply chains.

One of our approaches is to undertake regular monitoring for indications of any form of slavery or human trafficking and whether we have sufficient controls in place. Information gathering through direct engagement with suppliers and other stakeholders is undertaken by

our ethical compliance and responsible sourcing teams. The information is used for risk assessments and planning of mitigation should issues arise. As soon as discussions commence with potential suppliers, checks against our standards are carried out including physical site visits as part of knowledge building of the prevailing activities.

The risks of modern slavery are constantly changing, as a result we review and improve our approach to ensure we are doing all we can as a business to prevent modern slavery or human trafficking taking place in our business and supply chains. We are committed to taking appropriate actions to remediate potential human rights issues when identified.

Framework

- Establish perspective of direct suppliers of goods and services. Our starting point is to engage with reputable suppliers. We engage with suppliers to ensure that they will adhere to our ethical standards. We are prepared to take actions if we find suppliers who do not wish to adhere to our values and the way we work.
- Risk assessment to determine priorities based on risk level
- Identify process for risk mitigation
- Training and communication
- Improvement to working conditions on sites where we have direct leverage.

Our operations

Within our business, all employees are core workers, permanently employed. We believe that the greatest risks of modern slavery and human trafficking lie with temporary/Agency workers. We have provided clear guidance to our Sourcing colleagues highlighting our requirements and watch-out when engaging with suppliers.

To ensure we mitigate this risk, one of our approaches involves engagement with employment agencies in order to understand how recruitment is managed. We have not established any cases that would be classed as modern slavery or human trafficking.

Risk Assessment

We analyse our risks from point of view of goods, services, and country of origin. Majority of our suppliers are based in the UK but, we also sourced from countries rated as high risk e.g., China. Taking the following factors into consideration –

- Supplier risk assessment
- Country of origin from where we source products and raw material
- Human rights and trafficking risks
- Understanding of labour rights
- Industry
- Type of work
- Horizon scanning to gather information about emerging risks

All direct suppliers are required to undertake unannounced social standards audit at a frequency commensurate with our risk assessment results. The audits are carried out against best practice international standards as set out in the ETI Base Code.

Raw Materials

Audits alone cannot resolve endemic issues such as modern slavery. However, it plays a vital role in ensuring minimum standards are met. Any palm oil used in production has a chain of custody certification by the RSPO in place. Some of the Cane sugar imported for packing is Fairtrade certified. The Fairtrade Standard addresses slavery through areas such as child labour, forced labour and workers' rights. Eliminating modern slavery is addressed within Fairtrade Producer Standards and Fairtrade Trader Standard.

Progress monitoring against commitments made in 2022/23

| Aim | Outcome |
|--|---|
| Engage with suppliers through integrated site visit assessments | This has commenced and has proven to be successful. No major issues have been identified with direct suppliers |
| SMETA audits – timely close out of non-conformances established | Own operations – achieved Direct suppliers – Achieved. Some areas requiring further visits within one year |
| Partner with stakeholders in order to help address global challenges on modern slavery and trafficking and drive changes in our supply chains. | Commenced. We are working with our procurement teams to ensure this is part of the agenda for all meetings. This includes NPD or new supply requirements. |

Plans for 2023/2024

There will be continuing to ensure that the non-conformances raised during SMETA audits are closed off correctly.

We will engage with suppliers through a supplier assessment tool created internally to monitor performance.

We will endeavour to visit suppliers on a risk-based approach in order to support them in the challenges around modern slavery.

We will continue to work with our internal sites to ensure we are being pro-active in the area of modern slavery awareness.

The SSC Board of directors approved this Modern Slavery Statement, and it is signed by the Managing Director on their behalf:



Martin Brewis
Managing Director

Date: 10/10/23