

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

This statement is provided in accordance with section 54 of the Modern Slavery Act 2015. It sets out Billington Foodservice's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and supply chains.

Billington Foodservice is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

To date we have not identified or been made aware of any slavery or human trafficking activities within our supply chain but should any such activities be highlighted to us then we would act immediately in line with our legal and moral obligations.

### **Organisational Structure and Supply Chains**

Billington Foodservice create and supply soups, sauces, Pies, recipe dishes and desserts to popular pubs and restaurants across the UK.

Billington Foodservice operates in the UK and supply base includes a combination of manufacturers and agents with full visibility back to manufacturer as part of our material approval and ongoing monitoring procedures.

Responsibility for Billington Foodservice's anti-slavery initiatives is as follows:

- **Policies:** The HR team is responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** Suppliers are encouraged to sign up to SEDEX and forms part of the Billington Group supplier questionnaire with supplier auditing carried out where deemed appropriate.
- **Investigations/due diligence:** The Head of Purchasing and the HR team are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. The Head of Purchasing would contact the primary supplier who would need to investigate within their chain. EBS has appointed a Group Auditor who is responsible for auditing our suppliers at both site and Group level.
- **Training:** The HR team will coordinate training as follows:
  - Training session to be delivered to Directors to raise awareness and highlight responsibilities
  - Training session to be delivered to the Purchasing team and appropriate members of the Technical team to better understand and respond to the identified slavery and human trafficking risks
  - Raise awareness to employees of modern slavery and human trafficking and guidance as to what action to take if these are suspected

### **Relevant Policies**

Billington Foodservice operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** Billington Foodservice encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can submit a confidential disclosure via the suggestion boxes which are located in each of the Production canteens and the Reception area.
- **Corporate social responsibility policy:** The CSR policy outlines our responsibilities to our employees in terms of provision of long term employment wherever possible, paying at least the living wage, employing from the local talent pool wherever possible and only using recruitment agencies that meet our standards and do not require any kind of security deposit of papers etc from their workforce.
- **Supplier/Procurement code of conduct:** Billington Foodservices encourages all of our suppliers to sign up to Sedex
- **Labour Suppliers policy:** Billington Foodservice uses only specified, reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from that agency. All labour suppliers are required to complete a declaration of compliance in relation to the Modern Slavery Act 2015 prior to supplying labour to Billington Food Service.

#### **Due Diligence**

Billington Food Service undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Billington Foodservice due diligence and reviews include:

- Use of a combination of supplier questionnaires and auditing to assess suppliers Ethical and CSR status
- Development of supply chain mapping through Authenticate platform

#### **Performance Indicators**

Billington Foodservice has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring employees of the Buying team, HR team and appropriate members of the Technical team as well as the Company Directors to have completed training on modern slavery;
- Development of Authenticate online platform to give visibility and mapping of supply chains back to source

#### **Training**

The organisation requires employees of the Buying team, HR team and appropriate members of the Technical team as well as the Company Directors to complete training on modern slavery and human trafficking.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

#### **Awareness Raising Programme**

As well as training staff, the organisation raises awareness of modern slavery issues by various communication methods explaining:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

#### **Director Approval**

This statement has been approved by Billington Foodservice Managing Director, who has overall responsibility for ensuring this policy is maintained and applied.

Signed:   
Paul Richards (Managing Director)

Date: 30.11.2018